

EPA REGISTRATION NUMBER 42750-174 Vol. 2

Material to be added to an e-Jacket/Jacket

Reg. No. 42750-174

Decision # 449326

Description:

acceptable notification

1. Placement within the e-Jacket/jacket:

☒ Default: (chronological, top = newest)

☐ File Location: (eg. "before page 45 in .pdf")

2. ☐ Send to Data Extraction contractors this material:

☐ Newly stamped accepted label

☒ Notification

☐ New CSF

☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: Maggie Rudick

Phone: 703-347-0257

Division: RD

Date: 05/20/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAY 20 2011

Morris Gaskins
Albaugh, Inc.
P.O. Box 2127
Valdosta, GA 31604-2127

Subject: Notification per PR Notice 2007-4: Update Container Disposal Instructions
Triclopyr Bee Technical
EPA Reg. No. 42750-174
Application Dated: May 19, 2011

Dear Mr. Gaskins:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice 2007-4 for the subject product.

The Registration Division (RD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the actions requested falls within the scope of this notice. The label submitted with the application has been date-stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please feel free to contact Maggie Rudick at (703) 347-0257 or rudick.maggie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", is written over a horizontal line.

Kable Bo Davis, Product Manager 25
Herbicide Branch
Registration Division (7505P)

NOTIFICATION

MAY 20 2011

TRICLOPYR BEE TECHNICAL

For Manufacturing Use Only

ACTIVE INGREDIENT:

Triclopyr BEE*: (3,5,6-trichloro-2-pyridinyl)oxyacetic acid, butoxyethyl ester 98.0%

INERT INGREDIENTS: 2.0%

TOTAL: 100.0%

*Acid Equivalent: triclopyr – 70.4%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Contract CHEMTREC at 1-800-424-9300 for transport or emergency medical treatment information.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, or using tobacco.

EPA Reg. No. 42750-174

EPA Est. No. 70553-IND-001

NET CONTENTS:

MANUFACTURED FOR:

Albaugh, Inc.
Ankeny, IA 50021

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turf; non-irrigation ditchbanks, and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such use(s). Consult Albaugh, Inc. for instructions for formulation and other information.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 32°F or agitate before use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

~~CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by the state and local authorities.~~

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent). Offer for recycling, if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use for disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Then offer for recycling or dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750-174	2. EPA Product Manager J. Mr. Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Triclopyr Bee Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>4/26/11</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION

MAY 20 2011

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label notification to revise Container Disposal instructions under PR Notice 2007-4 as amended April, 2008. (Replaces original notification of 4/12/11). This notification is consistent with the provisions of PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
			4
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container bulk	
		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins		Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Registrations Manager	
4. Typed Name Morris Gaskins		5. Date 5/19/11	



RE: Agency Letters
Morris Gaskins to: Maggie Rudick

05/19/2011 10:26 AM

Maggie,

Attached are the 8570-1 forms and revised labels (marked) for the following products:

Triclopyr BEE Technical
Triclopyr 44% TEA MUP
MCPA Ester Technical

If I've overlooked anything please let me know.

I will submit revised labels for other letter this afternoon.

Regards,

Morris Gaskins

-----Original Message-----

From: Rudick.Maggie@epamail.epa.gov [mailto:Rudick.Maggie@epamail.epa.gov]
Sent: Wednesday, May 18, 2011 1:53 PM
To: Morris Gaskins
Subject: Agency Letters

Hi Morris:

I apologize for taking so long to get these to you. I must have written the address incorrectly. If you want to email me the updated labels, I will look them over on Friday morning.

If you have any questions, please don't hesitate to call or email.

Have a nice afternoon,

Maggie L. Rudick
Environmental Protection Specialist
Herbicide Branch; Registration Division
Environmental Protection Agency
(703) 347-0257
Rudick.Maggie@epa.gov

(See attached file: [Untitled].pdf)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Morris Gaskins
Albaugh, Inc.
P.O. Box 2157
Valdosta, GA 31604-2127

APR 26 2011

Subject: NOTIFICATION CHANGES (EPA REG. NO. 42750-174, 42750-200, and 42750-214)

Dear Mr. Morris:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated April 12, 2011 for the following products:

Triclopyr BEE Technical
Triclopyr 44% TEA MUP
Technical Ester of MCPA


The Registration Division (RD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the action(s) requested does not clearly fall within the scope of PRN 2007-4 and will require additional administrative review of the related files. The language needs to comply with 'PR-Notice 2007-4'; therefore, changes need to be made to the following:

1. **Recycling statement should directly follow, "Do not reuse or refill this container".**
2. **In the Residue Removal Statement, please use exact phrasing regarding rigid, non-refillable containers. "Triple rinse or pressure rinse container (or equivalent) promptly after emptying."**
3. **In the "triple rinse as follows" instructions, please add the sentence, "Turn the container over onto its other end and tip it back and forth several times" directly after, "Stand the container on its end and tip it back and forth several times".**

Please be advised that PRNs are provided as guidance; they are not considered regulation by the Agency. Therefore, the RD reserves the right to make the above determination and concludes that this action must be submitted by you as an amendment. No further processing of this action will occur until a resubmission is made. The RD has determined that this action is denied and our records have been updated accordingly.

If you have any questions regarding this letter, contact Maggie Rudick at (703) 347-0257 or rudick.maggie@epa.gov.

Sincerely,


Kable Bo Davis, Product Manager 25
Herbicide Branch
Registration Division (7505P)

CORPORATE OFFICE
1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 (Phone)
800.247.8013 (Toll Free)
515.964.7813 (FAX)

ALBAUGH, INC.

GEORGIA OFFICE
P.O. Box 2127
Valdosta, GA 31604-2127
229.244.3288 (Phone)
229.244.5841 (FAX)

Fed-X

April 12, 2011

Document Processing Desk (NOTIFY)
Mr. Bo Davis (PM 25)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: PR Notice 2007-4

Dear Mr. Davis,

The enclosed submission for the below referenced registration is a label notification in response to the Agency's PR Notice 2007-4 for Container Disposal revision.

PRODUCT	EPA REG. NO.
Imazethapyr TGAI	42750-145
Triclopyr 44% TEA MUP	42750-200
Triclopyr BEE Technical	42750-174✓
Triclopyr TGAI	42750-123
Picloram Acid Technical	42750-78
Technical Bromoxynil Octanoic Acid	42750-54
Propazine Technical	42750-149

Three copies of the draft label with changes noted with strikeout/bold text are enclosed. The PRN certification statement is listed on the 8570-1 forms.

Please call if you have any questions.

Regards,

Morris Gaskins
Registrations Manager
Albaugh, Inc.



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS
www.albaughinc.com



United States
Environmental Protection Agency
Washington, DC 20460

☐
☐
☒

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750-174	2. EPA Product Manager Mr. Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Triclopyr Bee Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label notification to revise Container Disposal instructions under PR Notice 2007-4 as amended April, 2008. (~~Replaces original notification of 9/24/00~~) This notification is consistent with the provisions of PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal, 30 gal, Bulk		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Morris Gaskins		Title Registrations Manager		Telephone No. (Include Area Code) 229-244-3230	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Registrations Manager			
4. Typed Name Morris Gaskins		5. Date 4/12/11			

DATA PACKAGE BEAN SHEET

Date: 31-Mar-2010

Page 1 of 2

Decision #: 403767

DP #: (375986)

NON PRIA

Parent DP #:

Submission #: 841446

*** Registration Information ***

Registration: 42750-174 - TRICLOPYR BEE TECHNICAL

Company: 42750 - ALBAUGH INC

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Juanita Gilchrist JGILCHRI

Sent Date: 09-Dec-2008

Calculated Due Date: 24-Mar-2009

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (570) CONDITIONAL REGISTRATION FOLLOW-UP;DATA REQUIRED;REQUIRES RD REVII

Ingredients: 116004, Acetic acid, ((3,5,6-trichloro-2-pyridinyl)oxy)-, 2-butoxyethyl ester(98%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 31-Mar-2010

Due Back: _____

DP Ingredient: 116004, Acetic acid, ((3,5,6-trichloro-2-pyridinyl)oxy)-, 2-butoxyethyl ester

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 13-Jan-2009

Team Name: _____

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Pls review storage stability and corrosion.

Thanks, Juanita 305-6965

Jb

Completion of 21-Day Content Screen

PM- 25

EPA Reg. # (File Symbol) 42750-174

Decision # D 415882

Data package delivered to
you on 9/16/08.
(date)

Jacket/Mini-jacket will be
transferred to you today.
(Pick up from Document Center)

Thank you,

Registration Division's 21-Day Content Team

Memorandum

Date: 9 / 11 / 09

To: PM75, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a:

- ☒ fully accepted submission
- ☐ partially accepted submission
- ☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 11, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ALBAUGH INC
1525 NE 36TH STREET
ANKENY, IA 50021

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 09-SEP-09. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3



S: 857645

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☒ Yes ☐ No

Company: 42750 ALBAUGH INC V

Risk Manager: Registration Division, Risk Management Team 25

Print Letter

Enter More Information

Tracking

Product #: 42750-174 Product Name: TRICLOPYR BEE TECHNICAL

Override#:

Me Too Section3: 62719-87

Me Too Product Name: TRICLOPYR BUTOXYETHYL ESTER

Application Date: 04-Sep-2009



OPP Rec'd Date: 09-Sep-2009



Front End Date: 09-Sep-2009



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Receipt Content	Des
Study	
CSF	

Fast Track: ☐

New Ingredient: ☐

View/Edit

Receipt Description:

To add alternate manufacturing facility as CSF alternate # 1

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.**Valdosta Office**

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

478480-00

FED-X

September 4, 2009

Mr. Jim Tompkins (Team 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

RE: Triclopyr BEE Technical
EPA Reg. No. 42750-174

Dear Mr. Tompkins,

The enclosed submission for the above referenced registration is a proposed alternate CSF in support of an additional manufacturing facility. Albaugh believes this submission qualifies as a R340 classification with a 4 month review time. A copy of the PRIA fee payment sent to the EPA lockbox is enclosed.

The following documents are included in support of this submission:

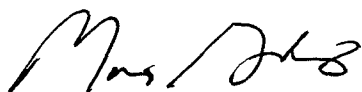
- 8570-1 Application form
- Alternate #1 CSF (2 copies)

'848001 • Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)

'848002 • Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.

Agri Star®
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS

www.albaughinc.com



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

October 4, 2010

Mr. Morris Gaskins
P.O. Box 2127
Valdosta, GA 31604

Mr. Gaskins:

RE: REVISED SEPTEMBER 22, 2010 AGENCY MEMO TO INSERT CORRECTED
ACCEPTED CSF DATE; ADMINISTRATIVE LETTER DATED SEPTEMBER 4, 2009;
TRICLOPYR BEE TECHNICAL; EPA REG. NO. 42750-174; ALTERNATE
MANUFACTURING SOURCE – CSF DATED AUGUST 3, 2010

Your alternate manufacturing source for product with EPA File Symbol 42750-174 is approved per the Confidential Statement of Formula dated August 3, 2010.

Please contact Phil Errico at 703-30506663/ errico.philip@epa.gov for additional assistance with this matter.

Best Regards,

A handwritten signature in black ink, appearing to read "J. Tompkins", written over the printed name and title.

James A. Tompkins PM 25
Herbicide Branch/Registration Division 7505P

SEP 22 2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Sent by email 8/27/10

*Superseded by
October 4, 2010 letter*

Mr. Morris Gaskins
P.O. Box 2127
Valdosta, GA 31604

Mr. Gaskins:

RE: ADMINISTRATIVE LETTER DATED SEPTEMBER 4, 2009; TRICLOPYR BEE
TECHNICAL; EPA REG. NO. 42750-174; ALTERNATE MANUFACTURING SOURCE –
CSF DATED SEPTEMBER 4, 2009

Your alternate manufacturing source for product with EPA File Symbol 42750-174 is approved
per the Confidential Statement of Formula dated ~~September 4, 2009~~ *AUGUST 3, 2010 per 10-4-10 Hr*

Please contact Phil Errico at 703-30506663/ errico.philip@epa.gov for additional assistance
with this matter.

Best Regards,

A handwritten signature in black ink, appearing to read "J. Tompkins".

James A. Tompkins PM 25
Herbicide Branch/Registration Division 7505P

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.**Valdosta Office**

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

478480-00

FED-X

September 4, 2009

Mr. Jim Tompkins (Team 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

RE: Triclopyr BEE Technical
EPA Reg. No. 42750-174

Dear Mr. Tompkins,

The enclosed submission for the above referenced registration is a proposed alternate CSF in support of an additional manufacturing facility. Albaugh believes this submission qualifies as a R340 classification with a 4 month review time. A copy of the PRIA fee payment sent to the EPA lockbox is enclosed.

The following documents are included in support of this submission:


- 8570-1 Application form
- Alternate #1 CSF (2 copies)

'7848001 • Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)

'848002 • Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.

Agri Star®
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS

www.albaughinc.com

FREE

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

Date: July 29, 2010

SUBJECT: Product Chemistry Review of TRICLOPYR BEE Technical

FROM: Akiva Abramovitch, Ph.D. *Akiva*
Technical Review Branch / RD (7505P)

THROUGH: Shyam B. Mathur, Ph.D. *SBM 8/5/10*
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

TO: Phillip Erico, Reviewer / James Tompkins, Product Manager, RM 25
Herbicide Branch / RD (7505P)

DP BARCODE: DP 373387& 380113

DECISION No.: 419882

Registration Number 42750-174

PRODUCT NAME: TRICLOPYR BEE Technical

PCC: 116004

REGISTRANT: ALBAUGH

USE: Herbicide .

FOOD USE: Yes [X] No []

MRID Numbers: 478480-01, 02, MRID 47383702 and 481118-00 & 02

INTRODUCTION:

Albaugh has submitted the product chemistry data to support a proposed new manufacturing site in [REDACTED]. The registrant submitted product chemistry data that include product identity and composition, description of the materials used and the production process, 5 batch analysis and discussion of the formation of impurities and a CSF for the proposed manufacturing site with a listing of the impurities and the certified limits. (830.1550, 1600, 1620, 1670, 1750) in MRID 478480-01 and 02 and MRID 473837-02 and 01.

Additional data was submitted for review in MRID 481118-01 to address analysis of potentially present toxic impurities from the manufacturing process as requested by the Agency (see DP373387, February 24, 2010).

TRB has been asked to evaluate the product chemistry data submitted to support the proposed new manufacturing site and the proposed revised alternate CSF #1 dated August 3, 2010 (Previously dated September 4, 2009).

SUMMARY OF FINDINGS:

1. The technical product contains 98% Technical Butoxy Ethyl Ester (3,5,6-trichloro-2-pyridyl) oxyacetic acid butoxy ethyl ester) Triclopyr BEE Technical Herbicide as the active ingredient with the product label claim of 98%.
2. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) for 40CFR§158.155 and 158.175 are satisfied with the revised CSF dated August 3, 2010 listing all toxic impurities.
3. The submitted product chemistry data corresponding to Guideline 830.1600 series (description of materials used to produce the product) including 830.1650 (description of formulation process) and

1

Product ingredient source information may be entitled to confidential treatment

BARCODE: D373387& 380113; **REG. No.** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

830.1670 (discussion of the formation of impurities) satisfy the data requirements (MRID 478480-01 and 02).

4. The petitioner submitted the method used for the 5 batch analysis for guideline 830.1800 (enforcement analytical method) and satisfied the data requirements (47848001and 02 and MRID 473837-02).

5. The petitioner is relying on data corresponding to guidelines 830 Series Subgroup B (physical-chemical properties) that was submitted for the registration of the product (data gaps cited in DP352826)

CONCLUSIONS:

1) The 5 batch analysis indicated that samples ranged from 98.12% to 99.23% with an average of 98.40%. All batches were within a narrow range and within the certified limits. The product has a label claim of 98% Triclopyr BEE.

2) Alternate CSF # 1 dated August 3, 2010 is acceptable. The CSF reflects the 5 batch analysis results for the alternate site and all the impurities including all the toxic impurities were listed on the CSF. The registrant also provided evidence that a toxic impurity of concern was not present in the technical product at detectable levels. The active ingredient was listed at 98.41% and all the impurities were below the certified upper limits listed on the basic formulation.

Table 1. Manufacturing and Impurity Data for TGA/MUP				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	478480-01	A	Confidential appendix
830.1600	Description of materials used to produce the product	478480-01	A	Confidential appendix
830.1620	Description of production process	478480-01	A	Confidential appendix
830.1670	Discussion of formation of impurities	478480-01	A	Confidential appendix
830.1700	Preliminary analysis	478480-02 and 481118-01	A	Confidential appendix
830.1750	Certified limits	478480-01	A	Confidential appendix
830.1800	Enforcement analytical method	478480-02 and 47383702	A	
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

830 Series Subgroup B (Physical-Chemical Properties):

The registrant relies on data submitted for the original registration of this product.

BARCODE: D373387& 380113; **REG. No.** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

830.1550. Product identity & Composition: (MRID 478480-01)

Composition:

Product Name: Triclopyr BEE Technical

Chemical Name:

IUPAC: 2-butoxyethyl 3,5,6-trichloro-2-pyridyloxyacetate

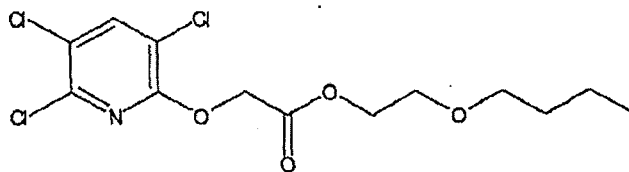
Chemical Abstracts: 2-butoxyethyl [(3,5,6-trichloro-2-pyridinyl)oxy]acetate

CAS Registry Number: 64700-56-7

Molecular Formula: $C_{13}H_{16}Cl_3NO_4$

Molecular Weight: 356.33

Structure:



830.1800. Enforcement of analytical method: (MRID 478480-01 and 473837-02).

See HPLC method for active ingredient and major impurities on pages 4-32 of MRID 473837-02.

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

Composition:

Product Name: Triclopyr BEE Technical

Chemical Name:

IUPAC: 2-butoxyethyl 3,5,6-trichloro-2-pyridyloxyacetate

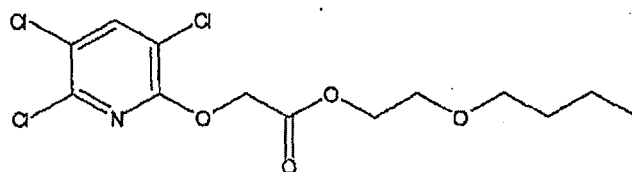
Chemical Abstracts: 2-butoxyethyl [(3,5,6-trichloro-2-pyridinyl)oxy]acetate

CAS Registry Number: 64700-56-7

Molecular Formula: $C_{13}H_{16}Cl_3NO_4$

Molecular Weight: 356.33

Structure:



BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

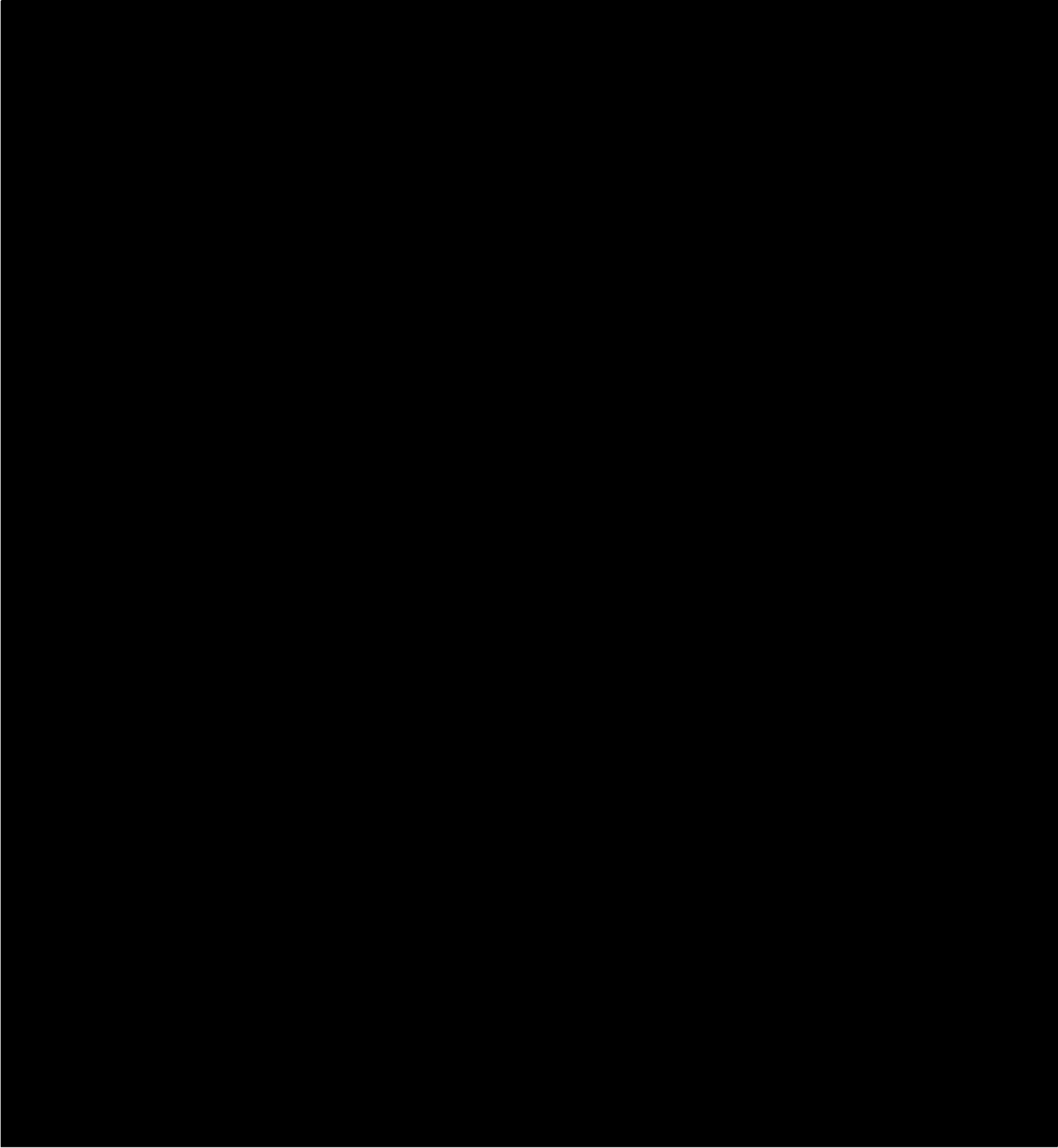
CONFIDENTIAL APPENDIX:

830.1600. Description of Materials used to produce the product:



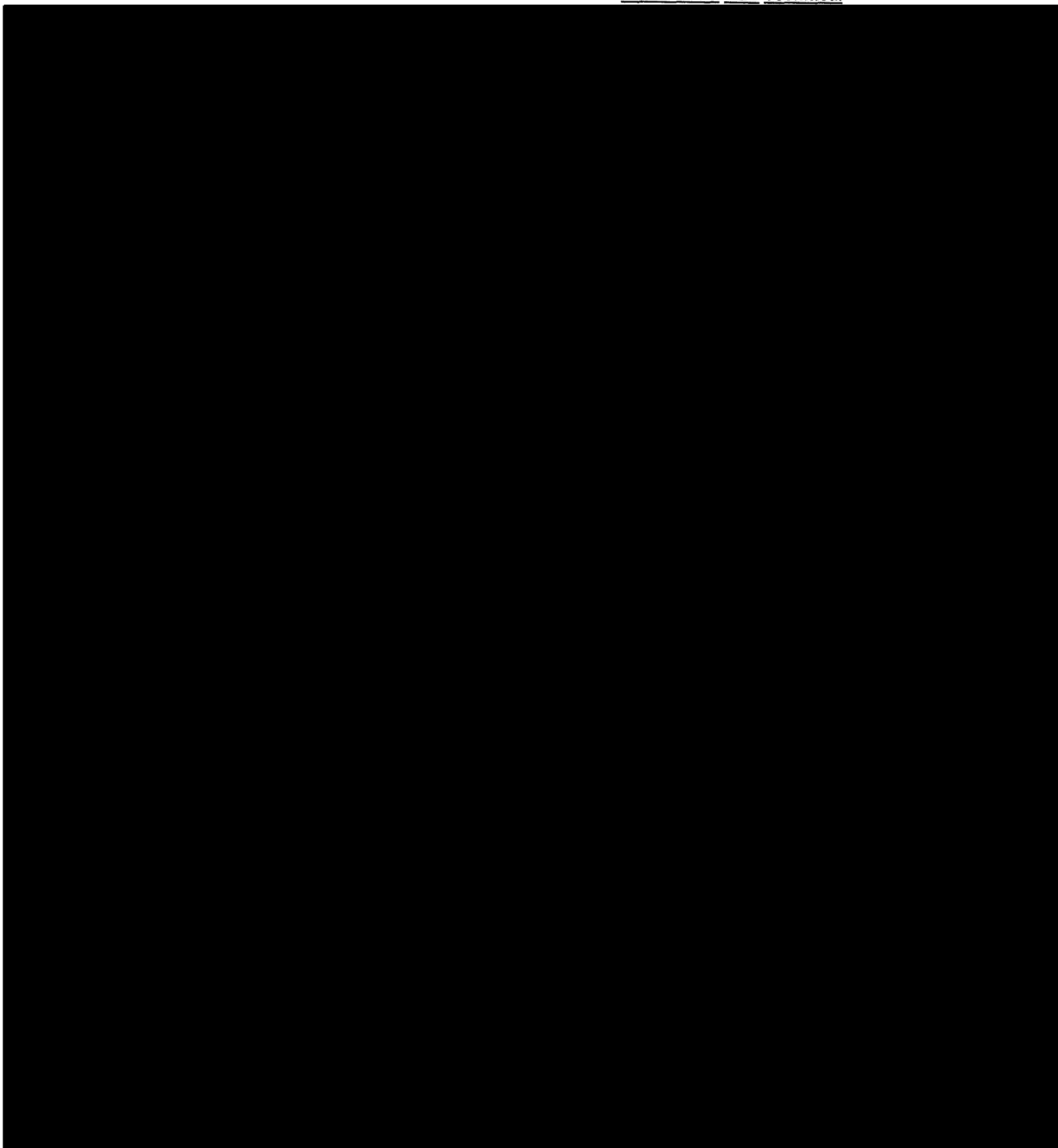
Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical



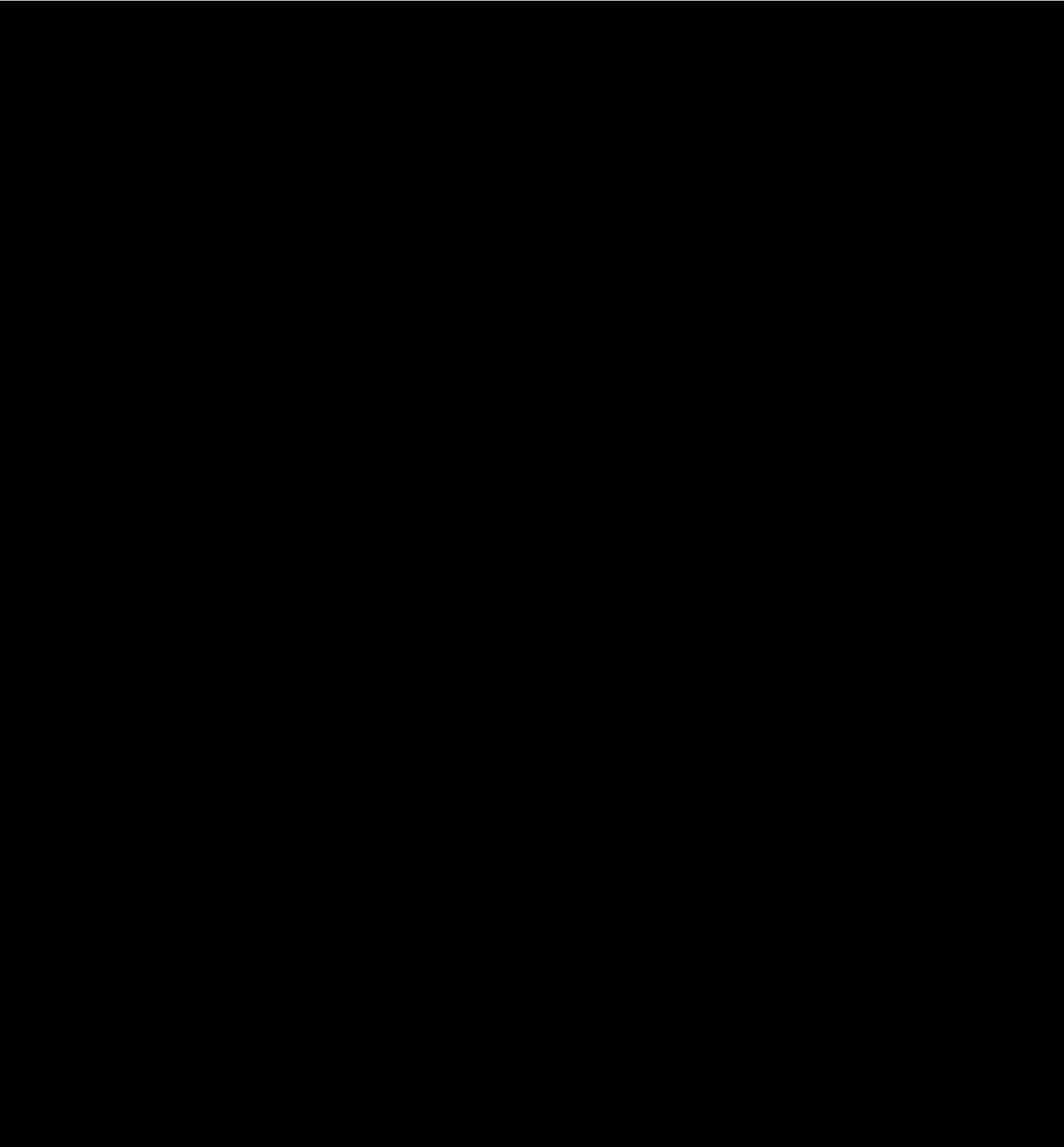
Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical



Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

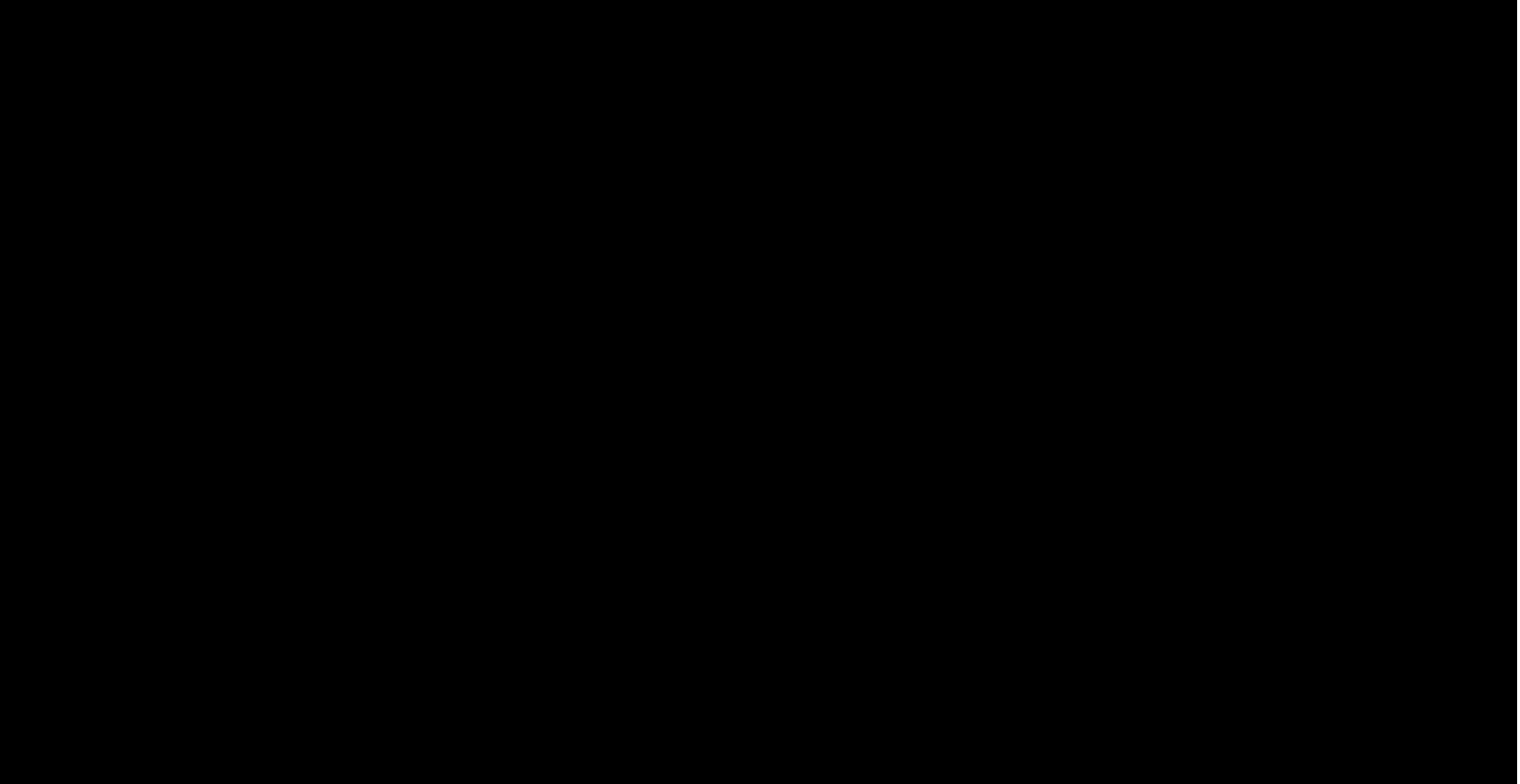


BARCODE: D373387& 380113; **REG. No.** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

830.1700.Preliminary analysis:



BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT:TRICLOPYR BEE Technical



830.1750. Certified limits:

The certified limits for the active ingredient and the process related impurities were established based on the five batch analysis (above).



RE: Revised memo for product with EPA Reg. No. 42750-174
Morris Gaskins to: Philip Errico

10/04/2010 03:56 PM

Thanks Phil

Also, the revised Imazethapyr + Glyphosate label went back out to you today

-----Original Message-----

From: Errico.Philip@epamail.epa.gov [mailto:Errico.Philip@epamail.epa.gov]
Sent: Monday, October 04, 2010 3:24 PM
To: Morris Gaskins
Subject: Revised memo for product with EPA Reg. No. 42750-174

Morris,
Please see memo correcting the date of the last approved CSF for product
with file symbol 42750-174.
Thanks.

Philip (Phil) V. Errico , Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov



Re: EPA responses to product with EPA Reg. Nos. 42750-174 & 42750-147,
RE: Alternate Mfging Source, and Rotational Crop Label Request.
Morris Gaskins to: Philip Errico

09/28/2010 01:01 PM

Great,

Thanks Phil

----- Original Message -----

From: Errico.Philip@epamail.epa.gov <Errico.Philip@epamail.epa.gov>
To: Morris Gaskins
Cc: Tompkins.Jim@epamail.epa.gov <Tompkins.Jim@epamail.epa.gov>;
Kenny.Dan@epamail.epa.gov <Kenny.Dan@epamail.epa.gov>
Sent: Tue Sep 28 12:00:31 2010
Subject: RE: EPA responses to product with EPA Reg. Nos. 42750-174 &
42750-147, RE: Alternate Mfging Source, and Rotational Crop Label Request.

Morris,

You are correct. Let me revise that letter to include the last accepted CSF, so there are no questions on what was looked at. The file does contain the 8/3/2010 CSF as you stated.

So the letter you will receive will show the last accepted CSF date for your records. It will be sometime next week when I can get to it due to the end of the year push.

Thanks,

Philip (Phil) V. Errico , Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov

From: Morris Gaskins <MorrisG@albaughinc.com>
To: Philip Errico/DC/USEPA/US@EPA
Date: 09/28/2010 11:01 AM
Subject: RE: EPA responses to product with EPA Reg. Nos. 42750-174 &
42750-147, RE: Alternate Mfging Source, and Rotational Crop
Label Request.

Phil,

Just for my own clarification, the last CSF we submitted for this was dated 8/3/10 due to editing request from TRB review I believe.

Your letter for the Triclopyr BEE alt sources references September 4,

2009. Is this a typo?

Thanks,

Morris Gaskins

-----Original Message-----

From: Errico.Philip@epamail.epa.gov [
mailto:Errico.Philip@epamail.epa.gov]
Sent: Tuesday, September 28, 2010 8:17 AM
To: Morris Gaskins
Subject: Fw: EPA responses to product with EPA Reg. Nos. 42750-174 &
42750-147, RE: Alternate Mfging Source, and Rotational Crop Label
Request.

Mr. Gaskins,
Just to set the record straight, responses for both products with EPA
Reg. Nos. 42750-174, triclopyr BEE as the A.I. (Alternate Manufacturing
Source), and 42750-147, imazethapyr, and isopropylamine salt of
glyphosate as the A.I.'s (Rotational Crop Label Request) are attached
below.

Regards,

Philip (Phil) V. Errico, Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov
----- Forwarded by Philip Errico/DC/USEPA/US on 09/28/2010 08:07 AM

From: Philip Errico/DC/USEPA/US

To: Morris Gaskins <MorrisG@albaughinc.com>

Cc: Jim Tompkins/DC/USEPA/US@EPA, Dan Kenny/DC/USEPA/US@EPA

Date: 09/27/2010 12:13 PM

Subject: EPA responses to product with EPA Reg. No. 42750-174, RE:
Alternate Mfging Source, and Rotational Crop Label Request.

Mr. Gaskins,
Please see the attached files for EPA's response to your alternate
manufacturing source request, and a label amendment request relating to
rotational crop labeling.
Regards,

Philip (Phil) V. Errico , Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov



**Fw: EPA responses to product with EPA Reg. Nos. 42750-174 & 42750-147,
RE: Alternate Mfging Source, and Rotational Crop Label Request.**

Philip Errico to: Morris Gaskins

09/28/2010 08:16 AM

Mr. Gaskins,

Just to set the record straight, responses for both products with EPA Reg. Nos. 42750-174, triclopyr BEE as the A.I. (Alternate Manufacturing Source), and 42750-147, imazethapyr, and isopropylamine salt of glyphosate as the A.I.'s (Rotational Crop Label Request) are attached below.

Regards,

Philip (Phil) V. Errico, Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov

----- Forwarded by Philip Errico/DC/USEPA/US on 09/28/2010 08:07 AM -----

From: Philip Errico/DC/USEPA/US
To: Morris Gaskins <MorrisG@albaughinc.com>
Cc: Jim Tompkins/DC/USEPA/US@EPA, Dan Kenny/DC/USEPA/US@EPA
Date: 09/27/2010 12:13 PM
Subject: EPA responses to product with EPA Reg. No. 42750-174, RE: Alternate Mfging Source, and Rotational Crop Label Request.

Mr. Gaskins,

Please see the attached files for EPA's response to your alternate manufacturing source request, and a label amendment request relating to rotational crop labeling.

Regards,



REVISED LABEL EPA REG NO 42750-147, rotational crop intervals Sept 14, 2010.pdf



✓ EPA REG NO 42750-174, alternate source, CSF, Sept 22, 2010.pdf

Philip (Phil) V. Errico, Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov



**EPA responses to product with EPA Reg. No. 42750-174, RE: Alternate
Mfging Source, and Rotational Crop Label Request.**

Philip Errico to: Morris Gaskins

09/27/2010 12:13 PM

Cc: Jim Tompkins, Dan Kenny

Mr. Gaskins,

Please see the attached files for EPA's response to your alternate manufacturing source request, and a label amendment request relating to rotational crop labeling.

Regards,



REVISED LABEL EPA REG NO 42750-147, rotational crop intervals Sept 14, 2010.pdf



✓ EPA REG NO 42750-174, alternate source, CSF, Sept 22, 2010.pdf

Philip (Phil) V. Errico , Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov

DATA PACKAGE BEAN SHEET

Date: 13-Jul-2010

Page 1 of 2

Decision #: 419882

DP #: (380113)

PRIA

Parent DP #:

Submission #: 875761

*** Registration Information ***

Registration: 42750-174 - TRICLOPYR BEE TECHNICAL

Company: 42750 - ALBAUGH INC

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Philip Errico PERRIC02

Sent Date: 03-Jun-2010

Calculated Due Date: 30-Sep-2010

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (R340) NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEME

Ingredients: 116004, Acetic acid, ((3,5,6-trichloro-2-pyridinyl)oxy)-, 2-butoxyethyl ester(98%)

R340
#22231

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 13-Jul-2010

Due Back: _____

DP Ingredient: 116004, Acetic acid, ((3,5,6-trichloro-2-pyridinyl)oxy)-, 2-butoxyethyl ester

DP Title: 5 batch analy. requested in 2/24/2010 Prod. chem

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 31-Aug-2010

Team Name: CHEM

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Can be printed on its own page

*** Data Package Instructions ***

PRIA ACTION: Re-negotiated due date is Sept. 30, 2010.

Please review study for five batch analyses for solvent impurities per product chemistry review of 2/24/2010 (A. Abramovitch, Prod. Chem.

Team/TRB/RD) Does this study satisfy your questions on impurities and the CSF?

Thanks.

Phil Errico 305-6663

Due 9/30/30

MRID	MRID Status	Citation Reference	Guideline
48111801		Li, H. (2010) Determination of Toluene and 1, 2-Dichloroethane in Triclopyr BEE TGA1: Final Report. Project Number: NC/2010/006. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 87 p.	830.1700/Preliminary analysis
48111801		Li, H. (2010) Determination of Toluene and 1, 2-Dichloroethane in Triclopyr BEE TGA1: Final Report. Project Number: NC/2010/006. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 87 p.	830.1800/Enforcement analytical method

FEE

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

Date: July 29, 2010

SUBJECT: Product Chemistry Review of TRICLOPYR BEE Technical

FROM: Akiva Abramovitch, Ph.D. *Akiva*
Technical Review Branch / RD (7505P)

THROUGH: Shyam B. Mathur, Ph.D. *SBM 8/5/10*
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

TO: Phillip Erico, Reviewer / James Tompkins, Product Manager, RM 25
Herbicide Branch / RD (7505P)

DP BARCODE: DP 373387& 380113

DECISION No.: 419882

Registration Number 42750-174

PRODUCT NAME: TRICLOPYR BEE Technical

PCC: 116004

REGISTRANT: ALBAUGH

USE: Herbicide .

FOOD USE: Yes [X] No []

MRID Numbers: 478480-01, 02, MRID 47383702 and 481118-00 & 02

INTRODUCTION:

Albaugh has submitted the product chemistry data to support a proposed new manufacturing site in [REDACTED]. The registrant submitted product chemistry data that include product identity and composition, description of the materials used and the production process, 5 batch analysis and discussion of the formation of impurities and a CSF for the proposed manufacturing site with a listing of the impurities and the certified limits. (830.1550, 1600, 1620, 1670, 1750) in MRID 478480-01 and 02 and MRID 473837-02 and 01.

Additional data was submitted for review in MRID 481118-01 to address analysis of potentially present toxic impurities from the manufacturing process as requested by the Agency (see DP373387, February 24, 2010).

TRB has been asked to evaluate the product chemistry data submitted to support the proposed new manufacturing site and the proposed revised alternate CSF #1 dated August 3, 2010 (Previously dated September 4, 2009).

SUMMARY OF FINDINGS:

1. The technical product contains 98% Technical Butoxy Ethyl Ester (3,5,6-trichloro-2-pyridyl) oxyacetic acid butoxy ethyl ester) Triclopyr BEE Technical Herbicide as the active ingredient with the product label claim of 98%.
2. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) for 40CFR§158.155 and 158.175 are satisfied with the revised CSF dated August 3, 2010 listing all toxic impurities.
3. The submitted product chemistry data corresponding to Guideline 830.1600 series (description of materials used to produce the product) including 830.1650 (description of formulation process) and

BARCODE: D373387& 380113; **REG. No.** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

830.1670 (discussion of the formation of impurities) satisfy the data requirements (MRID 478480-01 and 02).

4. The petitioner submitted the method used for the 5 batch analysis for guideline 830.1800 (enforcement analytical method) and satisfied the data requirements (47848001and 02 and MRID 473837-02).

5. The petitioner is relying on data corresponding to guidelines 830 Series Subgroup B (physical-chemical properties) that was submitted for the registration of the product (data gaps cited in DP352826)

CONCLUSIONS:

1) The 5 batch analysis indicated that samples ranged from 98.12% to 99.23% with an average of 98.40%. All batches were within a narrow range and within the certified limits. The product has a label claim of 98% Triclopyr BEE.

2) Alternate CSF # 1 dated August 3, 2010 is acceptable. The CSF reflects the 5 batch analysis results for the alternate site and all the impurities including all the toxic impurities were listed on the CSF. The registrant also provided evidence that a toxic impurity of concern was not present in the technical product at detectable levels. The active ingredient was listed at 98.41% and all the impurities were below the certified upper limits listed on the basic formulation.

Table 1. Manufacturing and Impurity Data for TGA/MUP				
GLN	Requirement	MRID	Status	Details and/or Deficiency
830.1550	Product Identity and composition	478480-01	A	Confidential appendix
830.1600	Description of materials used to produce the product	478480-01	A	Confidential appendix
830.1620	Description of production process	478480-01	A	Confidential appendix
830.1670	Discussion of formation of impurities	478480-01	A	Confidential appendix
830.1700	Preliminary analysis	478480-02 and 481118-01	A	Confidential appendix
830.1750	Certified limits	478480-01	A	Confidential appendix
830.1800	Enforcement analytical method	478480-02 and 47383702	A	
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

830 Series Subgroup B (Physical-Chemical Properties):

The registrant relies on data submitted for the original registration of this product.

BARCODE: D373387& 380113; **REG. No.** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

830.1550. Product identity & Composition: (MRID 478480-01)

Composition:

Product Name: Triclopyr BEE Technical

Chemical Name:

IUPAC: 2-butoxyethyl 3,5,6-trichloro-2-pyridyloxyacetate

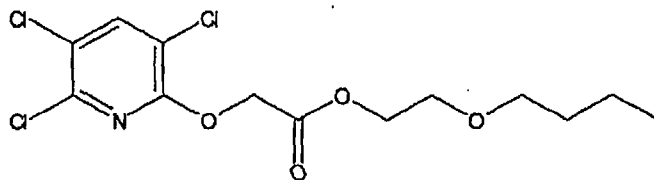
Chemical Abstracts: 2-butoxyethyl [(3,5,6-trichloro-2-pyridinyl)oxy]acetate

CAS Registry Number: 64700-56-7

Molecular Formula: $C_{13}H_{16}Cl_3NO_4$

Molecular Weight: 356.33

Structure:



830.1800. Enforcement of analytical method: (MRID 478480-01 and 473837-02).

See HPLC method for active ingredient and major impurities on pages 4-32 of MRID 473837-02.

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

Composition:

Product Name: Triclopyr BEE Technical

Chemical Name:

IUPAC: 2-butoxyethyl 3,5,6-trichloro-2-pyridyloxyacetate

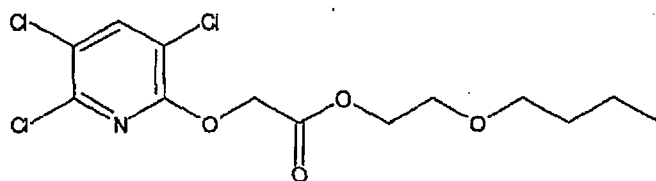
Chemical Abstracts: 2-butoxyethyl [(3,5,6-trichloro-2-pyridinyl)oxy]acetate

CAS Registry Number: 64700-56-7

Molecular Formula: $C_{13}H_{16}Cl_3NO_4$

Molecular Weight: 356.33

Structure:



Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387& 380113; **REG. No.** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

CONFIDENTIAL APPENDIX:

830.1600. Description of Materials used to produce the product:

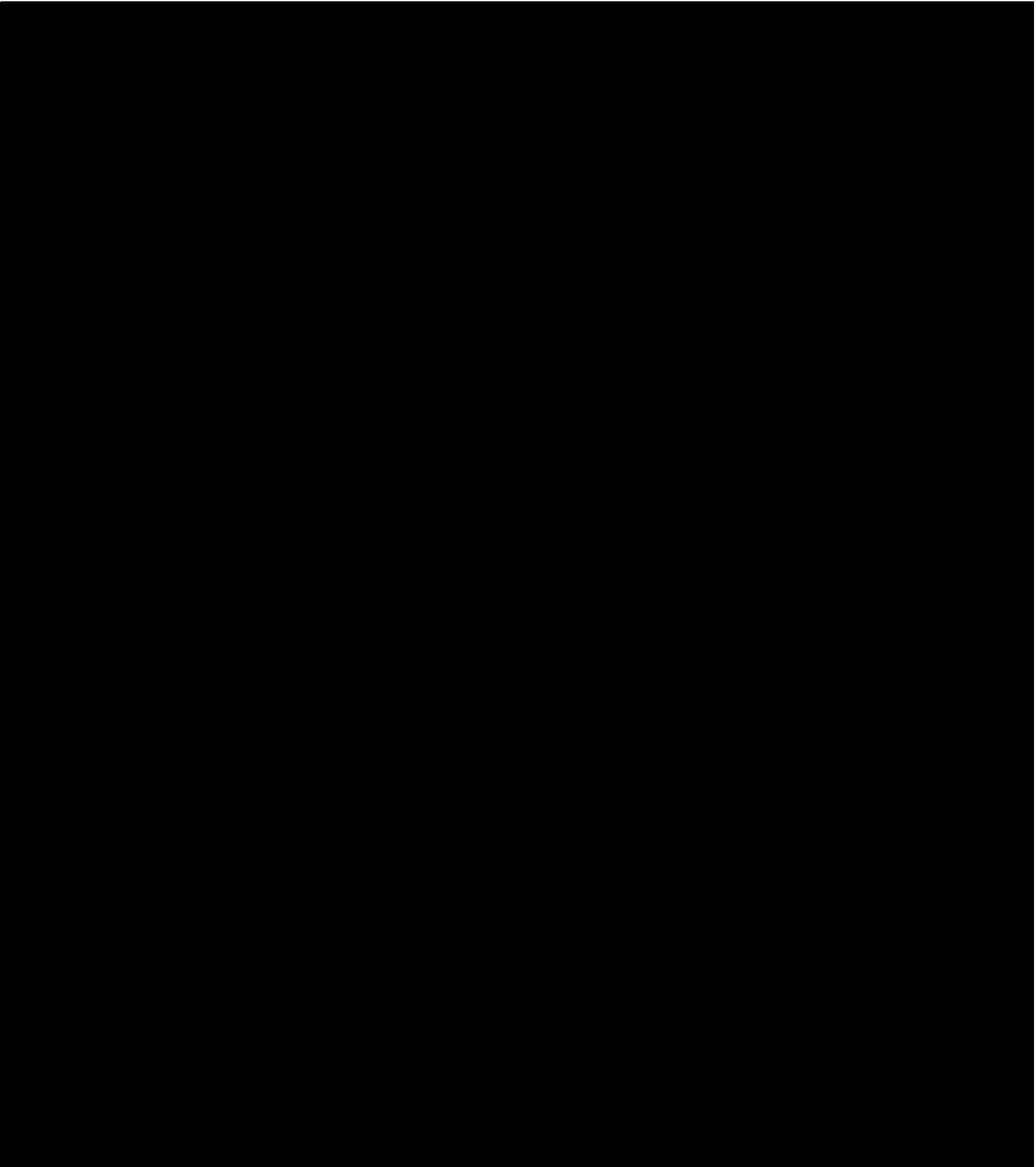


BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical



CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.

Valdosta Office

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

481118-00

Fed-X

June 1, 2010

Mr. Jim Tompkins (Team 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

RE: Triclopyr BEE Technical
EPA Reg. No. 42750-174

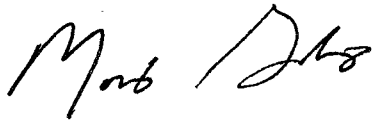
Dear Mr. Tompkins,

The enclosed submission for the above referenced registration is a 5-batch analysis for solvent impurities in support of an alternate manufacturing source. This study was performed at the request of the Agency's TRB to supplement a 5-batch Preliminary Analysis submitted under MRID number 478480-02.

- Application form 8570-1
- Alternate CSF (2 copies)
- 48111801 ▪ 5-batch Analysis for Determination of Toluene and 1,2-dichloroethane for Triclopyr BEE TGAI (3 copies)

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.

Agri Star®
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS

47

www.albaughinc.com



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750-174	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Triclopyr BEE Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>4/27/10</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of 5-batch impurity analysis in support of alternate manufacturing site.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins		Title Registrations Manager	
		Telephone No. (Include Area Code) 229-244-3288	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Registrations Manager	
4. Typed Name Morris Gaskins		5. Date 6/1/10	

Memorandum

Date: 06 / 10 / 10

To: PM 25, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 9, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ALBAUGH INC
1525 NE 36TH STREET
ANKENY, IA 50021

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 03-JUN-10. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 875761

Resubmission: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 42750 ALBAUGH INC

V

Risk Manager: Registration Division, Risk Management Team 25

Product #: 42750-174 Product Name: TRICLOPYR BEE TECHNICAL

Override#:

Me Too Section3: 62719-87

Me Too Product Name: TRICLOPYR BUTOXYETHYL ESTER

Application Date: 01-Jun-2010

OPP Rec'd Date: 03-Jun-2010

Front End Date: 03-Jun-2010

Risk Manager Send Date: 03-Jun-2010

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Receipt Content	Des
Study	

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

5-batch analysis for solvent impurities performed at request of TRB to supplement MRID 47848002

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date:

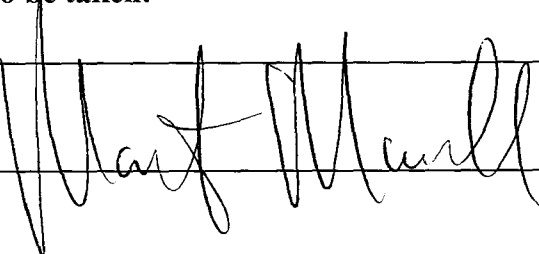
Form B: ☐ Signature Date:

Print Letter

Enter More Information

Tracking

View/Edit

Recommendation of Division Directors Negotiated Due Dates		
Decision #: 419882	Registration #: 42750-174	Petition #:
Fee Category: R340	PRIA Decision Time Frame: 4 months	
Submitted by: Phil Errico	Branch: Herbicide	Date: April 27, 2010
Company: Albaugh, Inc		
Original Due Date: January 31, 2010	Proposed New Due Date: September 30, 2010	
Previous Negotiated Due Dates: May 1, 2010		
Is the "Fix" in-house? No	If not, date "Fix" expected: May 10, 2010	
Issue (describe in detail): When TRB reviewed the request for an alternate manufacturing site, TRB concluded that the alternate CSF must be revised to either list two solvents in the manufacturing process that are considered to be of toxicological concern or explain why these solvents are not present in the product. The registrant expects to submit the required analysis and corrected CSF by May 10, 2010.		
Summary of Deficiency Type(s): Not Submitted (N) Deficiencies (D) Product Chemistry: <u> D </u> Acute Tox: <u> </u> Efficacy: <u> </u> Labeling: <u> </u> Other (describe): <u> </u>		
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): The PRIA date was originally renegotiated to May 1, 2010 to allow time for this issue to be resolved. However, the registrant was unable to get the required information to EPA before May 10.		
"75 Day" Letter sent? <u> </u> (Date sent) Yes <u> </u> X No and reason for none? The registrant was notified by e-mail with the expectation that the CSF would be quickly revised by adding the two solvents. However, the determination of how much solvent remains in the product took much longer than expected.		
Rationale for Proposed Due Date: The revised CSF and supporting documentation needs to go back to TRB for review. TRB is currently taking a full 90-days for their review.		
Registrant notified that this is the last negotiation? <u> </u> Yes <u> </u> Not Applicable		
Approve: <u> ✓ </u>	Disapprove:	
If disapproved, action to be taken:		
OD or DOD Signature: 	Date: <u> 4-30-10 </u>	

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.**Valdosta Office**

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

481118-00

Fed-X

June 1, 2010

Mr. Jim Tompkins (Team 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

RE: Triclopyr BEE Technical
EPA Reg. No. 42750-174

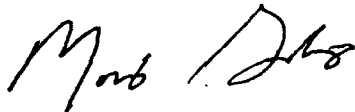
Dear Mr. Tompkins,

The enclosed submission for the above referenced registration is a 5-batch analysis for solvent impurities in support of an alternate manufacturing source. This study was performed at the request of the Agency's TRB to supplement a 5-batch Preliminary Analysis submitted under MRID number 478480-02.

- Application form 8570-1
- Alternate CSF (2 copies)
- 48111801 ▪ 5-batch Analysis for Determination of Toluene and 1,2-dichloroethane for Triclopyr BEE TGAI (3 copies)

Please call if you have any questions.

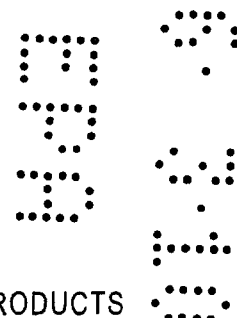
Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS

www.albaughinc.com



RE: Product with EPA Reg. No. 42750-174
Morris Gaskins to: Philip Errico

07/08/2010 03:43 PM

History: This message has been replied to.

Phil,

The chemistry study for solvent impurity analysis was submitted on 6/1/10 and assigned MRID # 481118-01.

Regards,

Morris

-----Original Message-----

From: Errico.Philip@epamail.epa.gov [mailto:Errico.Philip@epamail.epa.gov]
Sent: Thursday, July 08, 2010 3:35 PM
To: Morris Gaskins
Cc: Tompkins.Jim@epamail.epa.gov; Kenny.Dan@epamail.epa.gov
Subject: Product with EPA Reg. No. 42750-174

Mr. Gaskins,

Have you been able to send the information requested to complete the action on Triclopyr Bee Technical? I have not received anything from the front end to date.

Thanks.

Philip (Phil) V. Errico , Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov

*ordered study + Admin ltr. 7/13/10.
Then send to TRB for review.*

Due Sept. 30, 2010

DATA PACKAGE BEAN SHEET

Date: 28-Jul-2010

Page 1 of 2

Decision #: 419882

DP #: (373387)

PRIA

Parent DP #:

Submission #: 857645

*** Registration Information ***

Registration: 42750-174 - TRICLOPYR BEE TECHNICAL

Company: 42750 - ALBAUGH INC

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: James Tompkins JTOMPK02

Sent Date: Calculated Due Date: 30-Sep-2010

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (R340) NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEME

Ingredients: 116004, Acetic acid, ((3,5,6-trichloro-2-pyridinyl)oxy)-, 2-butoxyethyl ester(98%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 20-Jan-2010

Due Back:

DP Ingredient: 116004, Acetic acid, ((3,5,6-trichloro-2-pyridinyl)oxy)-, 2-butoxyethyl ester

DP Title:

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: RD / TRB 21-Jan-2010 24-Feb-2010 Last Possible Science Due Date: 01-Apr-2010

Team Name: CHEM 24-Feb-2010 Science Due Date: 05-Mar-2010

Reviewer Name: Abramovitch, Akiva 21-Feb-2010 24-Feb-2010 Sub Data Package Due Date:

Contractor Name:

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Can be printed on its own page

*** Data Package Instructions ***

Please review alternate CSF 1 for alternate manufacturing facility. Attached original CSF, alternate CSF, Manufacturing method, 5-batch analysis.

This submission was lost and has a PRIA Date of January 30, 2010

DP#: (373387)

*** Studies Sent for Review ***

Decision#: (419882)

MRID	MRID Status	Citation Reference	Guideline
47848001	Decision Deferred	Moyer, J. (2009) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr BEE Technical. Project Number: ALB09/10. Unpublished study prepared by Albaugh, Inc. 62 p.	830.1600/Description of materials used to produce the product
47848001	Decision Deferred	Moyer, J. (2009) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr BEE Technical. Project Number: ALB09/10. Unpublished study prepared by Albaugh, Inc. 62 p.	830.1550/Product Identity and composition
47848001	Decision Deferred	Moyer, J. (2009) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr BEE Technical. Project Number: ALB09/10. Unpublished study prepared by Albaugh, Inc. 62 p.	830.1620/Description of production process
47848001	Decision Deferred	Moyer, J. (2009) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr BEE Technical. Project Number: ALB09/10. Unpublished study prepared by Albaugh, Inc. 62 p.	830.1670/Discussion of formation of impurities
47848002	Decision Deferred	Wen, H. (2009) Preliminary Analysis and Enforcement Analytical Method of Triclopyr BEE TGA1 - Validation of Analytical Methodology for the Assay of Active Ingredient and Related Significant Impurities and Subsequent 5-Batch Analysis of Triclopyr BEE. Project Number: NC/2009/007, NC/GLP/SOP/724, NC2009007A. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 79 p.	830.1700/Preliminary analysis
47848001	Decision Deferred	Moyer, J. (2009) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, and Certified Limits for Triclopyr BEE Technical. Project Number: ALB09/10. Unpublished study prepared by Albaugh, Inc. 62 p.	830.1750/Certified limits
47848002	Decision Deferred	Wen, H. (2009) Preliminary Analysis and Enforcement Analytical Method of Triclopyr BEE TGA1 - Validation of Analytical Methodology for the Assay of Active Ingredient and Related Significant Impurities and Subsequent 5-Batch Analysis of Triclopyr BEE. Project Number: NC/2009/007, NC/GLP/SOP/724, NC2009007A. Unpublished study prepared by Nutrichem Laboratory Co., Ltd. 79 p.	830.1800/Enforcement analytical method

FEE

BARCODE: D373387; **REG. No.:** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

Date: February 22, 2010

D-419882

SUBJECT: Product Chemistry Review of TRICLOPYR BEE Technical

FROM: Akiva Abramovitch, Ph.D. *Akiva*
Technical Review Branch / RD (7505P)

THROUGH: Shyam B. Mathur, Ph.D. *SBM 2/24/10*
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

TO: Phillip Erico, Reviewer / James Tompkins, Product Manager, RM 25
Herbicide Branch / RD (7505P)

DP BARCODE: DP 373387

DECISION No.: 419882

Registration Number 42750-174

PRODUCT NAME: TRYCLOPYR BEE Technical

PCC: 116004

REGISTRANT: ALBAUGH

USE: Herbicide .

FOOD USE: Yes [Y] No []

MRID Numbers: 478480-01, 02 and MRID 47383702

INTRODUCTION:

Albaugh has submitted the product chemistry data to support a proposed new manufacturing site in [REDACTED]. The registrant submitted product chemistry data that include product identity and composition, description of the materials used and the production process, 5 batch analysis and discussion of the formation of impurities and a CSF for the proposed manufacturing site with a listing of the impurities and the certified limits. (830.1550, 1600, 1620, 1670, 1750) in MRID 47848001 and 02 and MRID 473837-02 and 01.

TRB has been asked to evaluate the product chemistry data submitted to support the proposed new manufacturing site and the proposed alternate CSF #1 dated September 4, 2009.

SUMMARY OF FINDINGS:

1. The technical product contains 98% Technical Butoxy Ethyl Ester (3,5,6- trichloro-2-pyridyl) oxyacetic acid butoxy ethyl ester) Herbicide as the active ingredient with the product label claim of 98%. The CSF of the basic formulation dated August 19, 2009 and this alternate CSF #1 are essentially identical in the percentages of the active ingredient and all the impurities. However, alternate CSF # 1 does not reflect the 5 batch analysis results and must be revised to represent the 5 batch analysis results. In addition, all toxic impurities must be listed on the CSF regardless of their percentages.
2. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) for 40CFR§158.155 and 158.175 respectively require a revised CSF.
3. The submitted product chemistry data corresponding to Guideline 830.1600 series (description of materials used to produce the product) including 830.1650 (description of formulation process) and 830.1670 (discussion of the formation of impurities) satisfy the data requirements (MRID 478480-01 and 02).

BARCODE: D373387; **REG. No.:** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

4. The petitioner submitted the method used for the 5 batch analysis for guideline 830.1800 (enforcement analytical method) and satisfied the data requirements (47848001 and 02 and MRID 473837-02).

5. The petitioner is relying on data corresponding to guidelines 830 Series Subgroup B (physical-chemical properties) that was submitted for the registration of the product (data gaps cited in DP352826)

CONCLUSIONS:

1) The 5 batch analysis indicated that samples ranged from 98.12% to 99.23% with an average of 98.40%. All batches were within a narrow range and within the certified limits. The product has a label claim of 98% Triclopyr BEE.

2) The CSF of the basic formulation dated August 19, 2009 and this alternate CSF #1 are essentially identical in the percentages of the active ingredient and all the impurities. However, alternate CSF # 1 does not reflect the 5 batch analysis results for the alternate site and must be revised to represent the 5 batch analysis results. For example, impurity I was calculated at [REDACTED] and not as [REDACTED] nominal concentration as listed on the CSF. In addition all toxic impurities must be listed on the CSF regardless of their percentages. These contaminants are not listed on the basic CSF either and the registrant must provide evidence that they are not present in the formulation.

A NOTE TO THE PM:

The alternate CSF must represent the 5 batch analysis of the alternate site and not a copy of the basic CSF. Also, it appears that group B data gaps cited in the original review for the registration of this product (DP 352826, Decision 391538) remain. All toxic impurities must be listed on all CSFs.

Table 1. Manufacturing and Impurity Data for TGA/MUP				
GLN	Requirement	MRID	Status	Details and/or Deficiency
830.1550	Product Identity and composition	478480-01	G	Confidential appendix
830.1600	Description of materials used to produce the product	478480-01	A	Confidential appendix
830.1620	Description of production process	478480-01	A	Confidential appendix
830.1670	Discussion of formation of impurities	478480-01	G	Confidential appendix
830.1700	Preliminary analysis	478480-02	A	Confidential appendix
830.1750	Certified limits	478480-01	G	Confidential appendix
830.1800	Enforcement analytical method	478480-02 and 47383702	A	
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

830 Series Subgroup B (Physical-Chemical Properties:

The registrant relies on data submitted for the original registration of this product.

BARCODE: D373387; **REG. No.:** 42750-174 **PRODUCT:** TRICLOPYR BEE Technical

830.1550. Product identity & Composition: (MRID 478480-01)

Composition:

Product Name: Triclopyr BEE Technical

Chemical Name:

IUPAC: 2-butoxyethyl 3,5,6-trichloro-2-pyridyloxyacetate

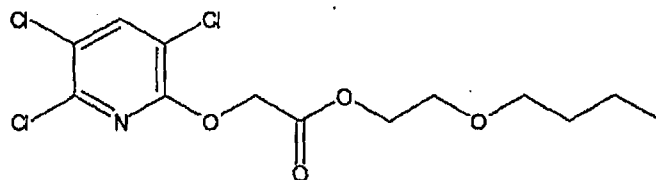
Chemical Abstracts: 2-butoxyethyl [(3,5,6-trichloro-2-pyridinyl)oxy]acetate

CAS Registry Number: 64700-56-7

Molecular Formula: $C_{13}H_{16}Cl_3NO_4$

Molecular Weight: 356.33

Structure:



830.1800. Enforcement of analytical method: (MRID 478480-01 and 473837-02).

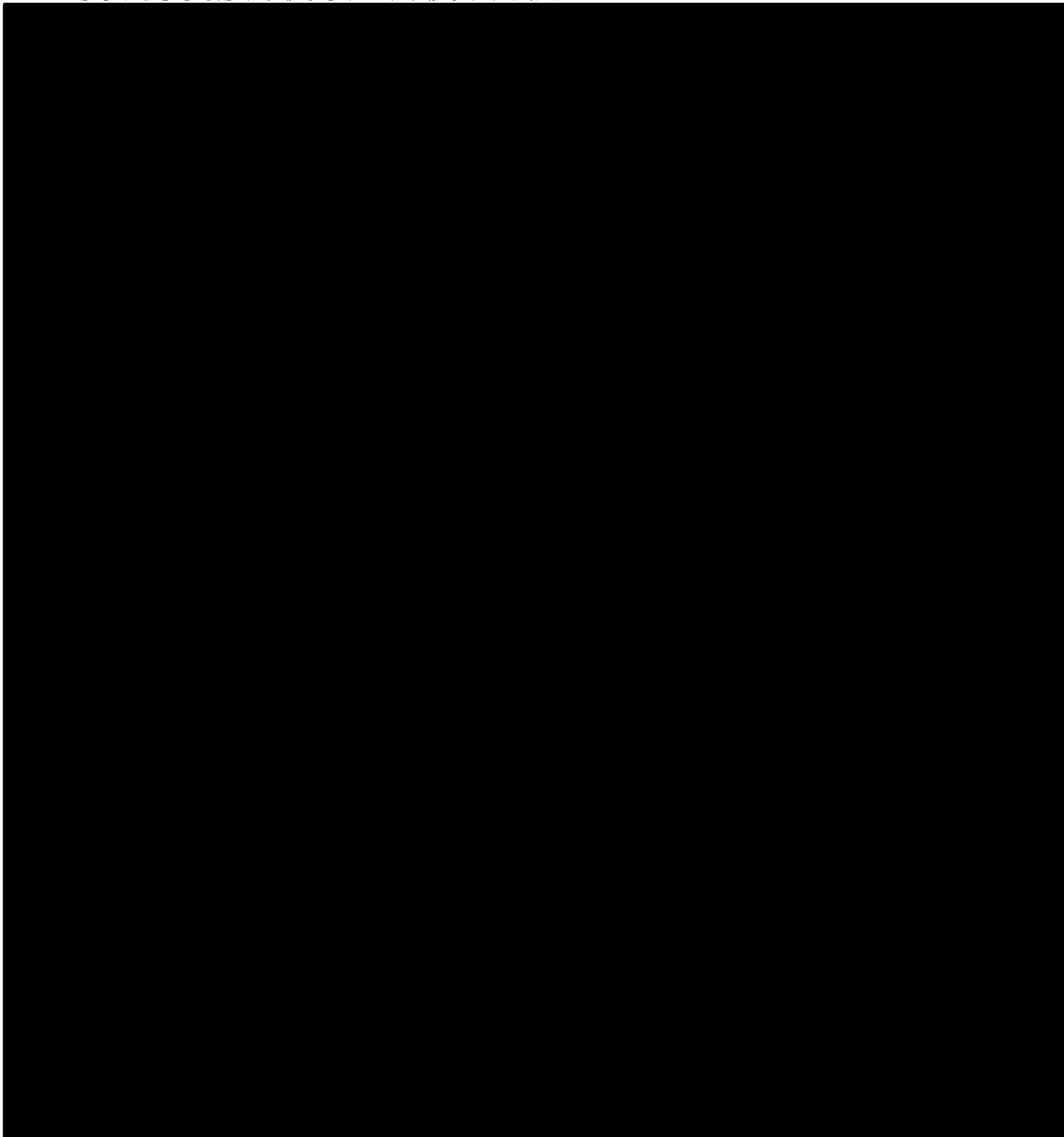
See HPLC method for active ingredient and major impurities on pages 4-32 of MRID 473837-02.

Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387; **REG. No. :**42750-174 **PRODUCT:** TRICLOPYR BEE Technical

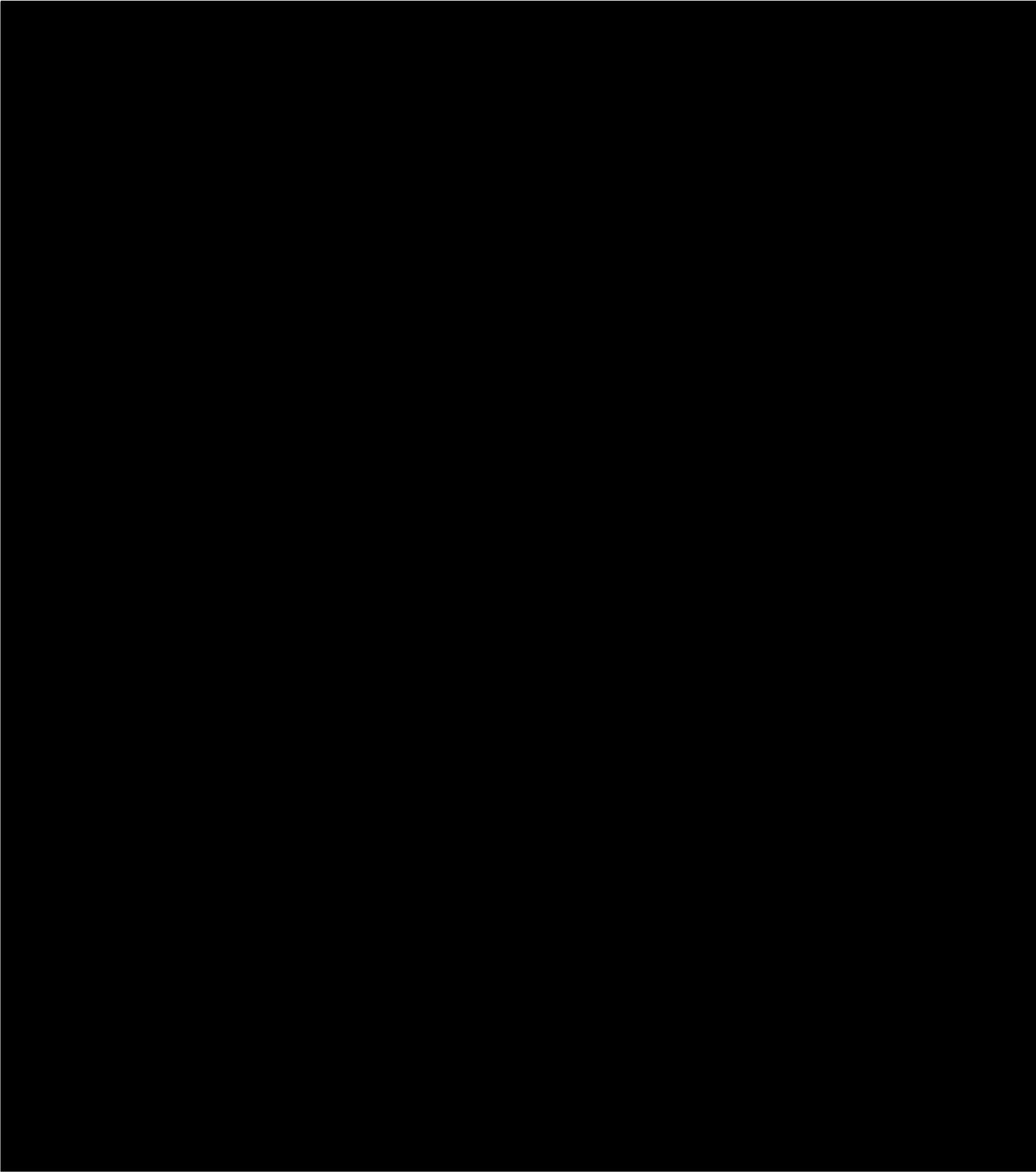
CONFIDENTIAL APPENDIX:

830.1600. Description of Materials used to produce the product:



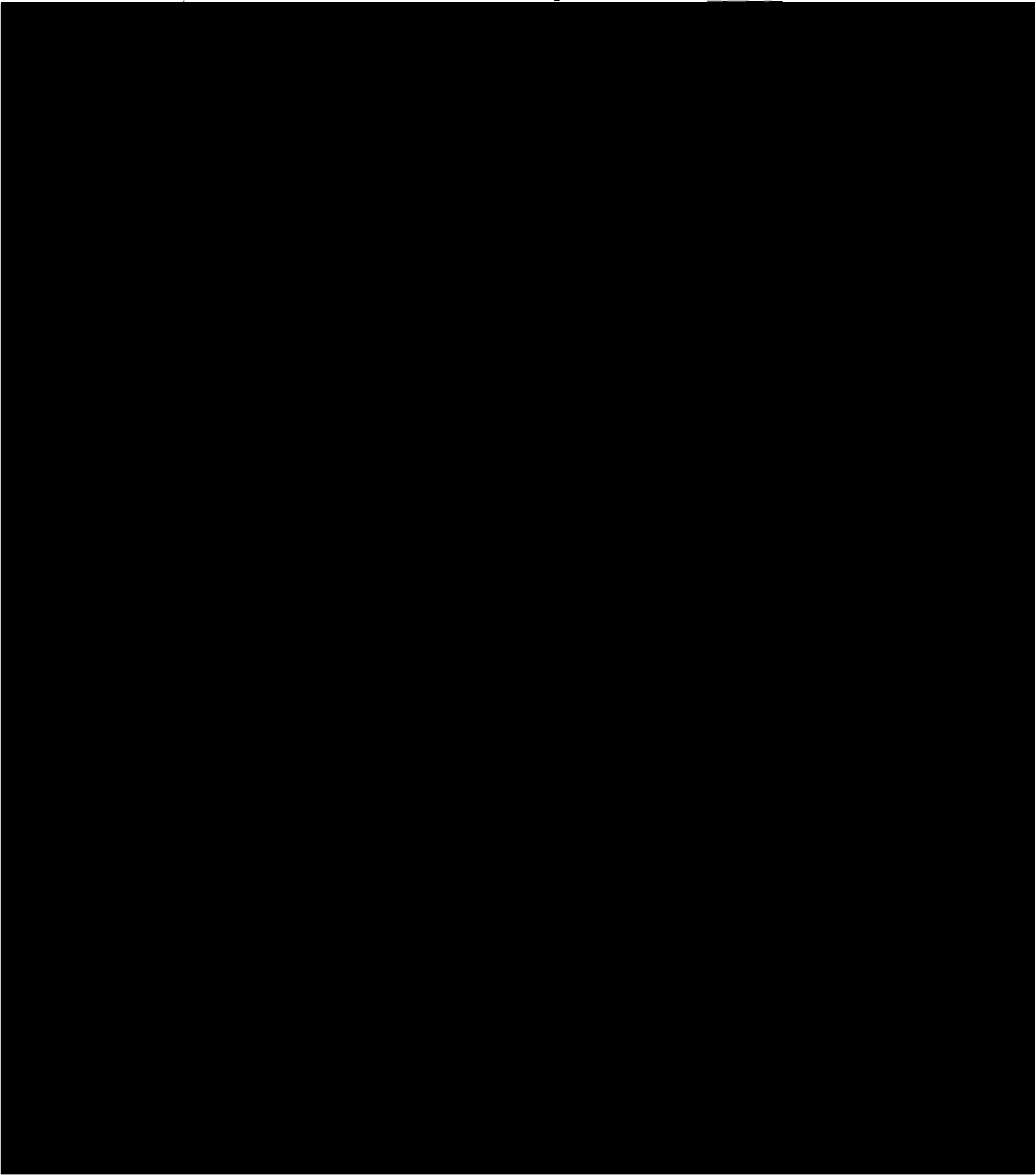
Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387; **REG. No. :**42750-174 **PRODUCT:** TRICLOPYR BEE Technical

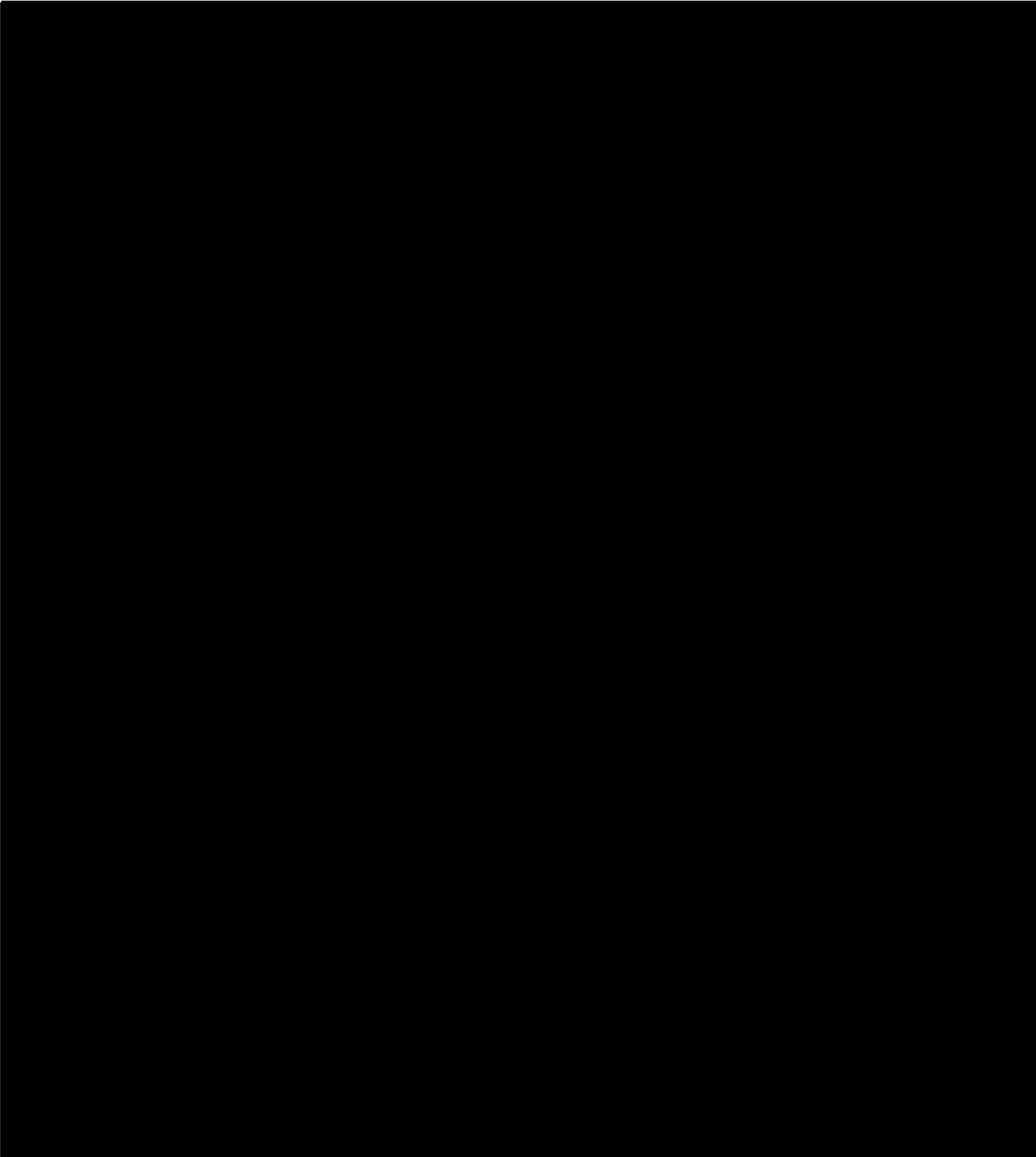


Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387; **REG. No. :**42750-174 **PRODUCT:** TRICLOPYR BEE Technical

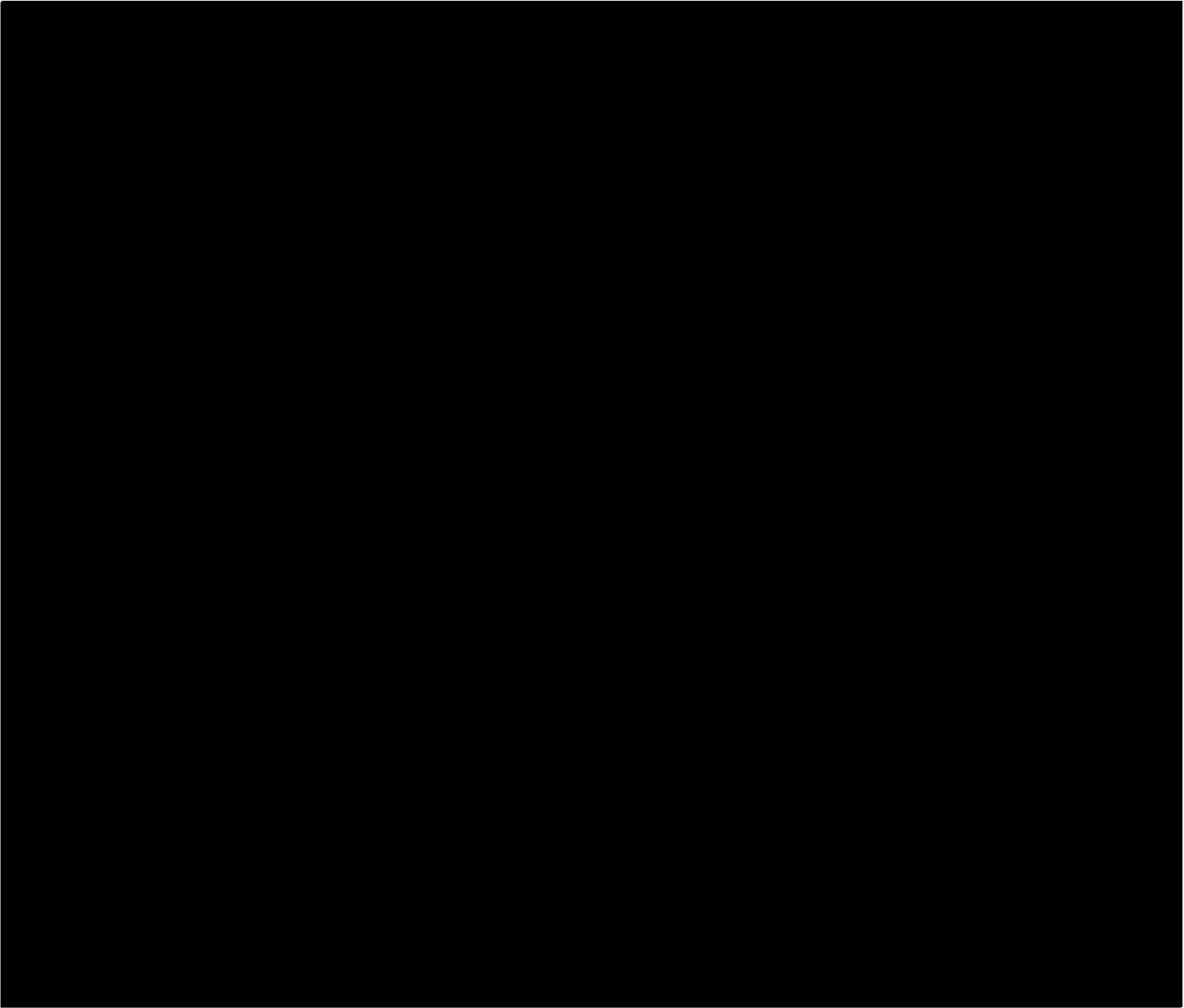


BARCODE: D373387 ; **REG. No. :**42750-174 **PRODUCT:** TRICLOPYR BEE Technical



BARCODE: D373387 ; **REG. No. :**42750-174 **PRODUCT:** TRICLOPYR BEE Technical

830.1700.Preliminary analysis:



830.1750. Certified limits:

The certified limits for the active ingredient and the process related impurities were established based on the five batch analysis (above).

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.

Valdosta Office

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

E-mail

April 27, 2010

Mr. Jim Tompkins (Team 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

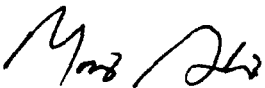
RE: Triclopyr BEE Technical
EPA Reg. No. 42750-174
PRIA extension request for OPPIN Decision Number D-419882

Dear Mr. Tompkins,

Albaugh formally requests a second 3-month extension for the above referenced product and submission. The additional analytical data for impurities requested by TRB has just been completed and will be submitted to EPA in 1-2 weeks. This PRIA extension will allow TRB time to review the data and revised CSF.

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.

Agri Star
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS
www.albaughinc.com



FW: Alternate CSF for 42750-174 triclopyr BEE Technical.
Morris Gaskins to: Philip Errico

04/27/2010 11:46 AM

Phil,

Attached is a second PRIA extension request for the Triclopyr Ester Technical alternate manufacturing site.

I am forwarding you the email for the first extension in case you were unfamiliar with the history of this action.

I should have the final report in hand in a couple of weeks and will submit along with a revised CSF at that time.

Call if any questions.

Regards,

Morris Gaskins
Albaugh, Inc.

-----Original Message-----

From: Morris Gaskins
Sent: Thursday, January 21, 2010 10:32 AM
To: Tompkins.Jim@epamail.epa.gov
Subject: RE: Alternate CSF for 42750-174 triclopyr BEE Technical.

Jim,

Attached is the extension request letter.

Also, can I ask a small favor on another matter?

I resubmitted a label amendment for our Glyphosate 41% Plus (42750-61) on 11/25/09 in response to an Agency rejection letter. I know it's early but is there anyway you can push that amendment out ahead of schedule? I need it to update California and then get it into the channels with the new Container Disposal section before the August deadline.

Thanks,

Morris Gaskins
Albaugh, Inc.

-----Original Message-----

From: Tompkins.Jim@epamail.epa.gov [mailto:Tompkins.Jim@epamail.epa.gov]
Sent: Wednesday, January 20, 2010 4:33 PM
To: Morris Gaskins
Subject: RE: Alternate CSF for 42750-174 triclopyr BEE Technical.

Thank You for the quick response.

Jim Tompkins
Team Leader 25
Herbicide Branch

Registration Division

Phone 703 305 5697

Fax 703 308 0029

E-mail Tompkins.jim@EPA.GOV

From: "Morris Gaskins" <MorrisG@albaughinc.com>
To: Jim Tompkins/DC/USEPA/US@EPA
Date: 01/20/2010 03:54 PM
Subject: RE: Alternate CSF for 42750-174 triclopyr BEE Technical.

Jim,

I will discuss with my chemist and try to have a response as soon as possible

In the meantime I'll email you a formal PRIA extension request tomorrow morning.

Regards,

Morris

-----Original Message-----

From: Tompkins.Jim@epamail.epa.gov [mailto:Tompkins.Jim@epamail.epa.gov]

Sent: Wednesday, January 20, 2010 3:32 PM

To: Morris Gaskins

Subject: Alternate CSF for 42750-174 triclopyr BEE Technical.

The Product Chemist in the Technical Review Branch reviewed your alternate CSF and noted [REDACTED] and [REDACTED] which are solvents used in the manufacturing process and the Agency consider to be of toxicological significance do not appear on either your basic or alternate CSF's. Please provide an explanation of why these two solvents are not listed separately on your CSFs or provide revised CSFs listing these two solvents separately and providing the nominal concentration for each solvent.

Since your response will need to be returned to TRB for review, I request that you agree to a renegotiated PRIA date of March 1, 2010 to allow for a rereview of your submission.

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Manufacturing process information may be entitled to confidential treatment

Phone 703 305 5697
Fax 703 308 0029
E-mail Tompkins.jim@EPA.GOV

42750-174

02/24/2009

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Morris Gaskins
Registrations Manager
Albaugh, Inc.
P.O. Box 2127
Valdosta, GA 31604

FEB 24 2009

SUBJECT: Application for Pesticide Notification – Adding Advisory Statement and “KEEP
OUT OF REACH OF CHILDREN” Statement
Triclopyr BEE Technical
EPA Reg. No. 42750-174
Application Dated November 6, 2008

Dear Mr. Gaskins:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been date-stamped “Notification” and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

3/4

TRICLOPYR BEE TECHNICAL

For Manufacturing Use Only

ACTIVE INGREDIENT:

Triclopyr BEE*: (3,5,6-trichloro-2-pyridinyl)oxyacetic acid, butoxyethyl ester 98.0%

INERT INGREDIENTS: 2.0%

TOTAL: 100.0%

*Acid Equivalent: triclopyr – 70.4%

KEEP OUT OF REACH OF CHILDREN

NOTIFICATION

CAUTION

FEB 24 2009

FIRST AID

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Contract CHEMTREC at 1-800-424-9300 for transport or emergency medical treatment information.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, or using tobacco.

EPA Reg. No. 42750-174

EPA Est. No. 70553-IND-001

NET CONTENTS:

MANUFACTURED FOR:
Albaugh, Inc.
Ankeny, IA 50021

1

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turf; non-irrigation ditchbanks, and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such use(s). Consult Albaugh, Inc. for instructions for formulation and other information.

NOTIFICATION

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.

FEB 24 2009

PESTICIDE STORAGE: Store above 32°F or agitate before use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by the state and local authorities.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

2

2/4



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750-174	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Triclopyr BEE Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NOTIFICATION EPA Reg. No. _____ Product Name _____ FEB 24 2009	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 10/8/08
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of adding advisory statement per PR Notice 98-10 - Add KEEP OUT OF REACH OF CHILDREN statement

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no further changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

Section - III**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 250 gal	
5. Location of Label Directions <input checked="" type="checkbox"/> Attached to container		6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288
------------------------	--------------------------------	---

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Data Application Received
(Stamped)

2. Signature 	3. Title Registrations Manager
4. Typed Name Morris Gaskins	5. Date November 6, 2008

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
800.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.**Valdosta Office**

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

FED-X

September 4, 2009

Mr. Jim Tompkins (Team 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

RE: Triclopyr BEE Technical
EPA Reg. No. 42750-174

Dear Mr. Tompkins,

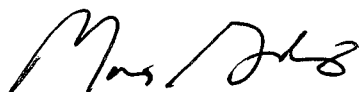
The enclosed submission for the above referenced registration is a proposed alternate CSF in support of an additional manufacturing facility. Albaugh believes this submission qualifies as a R340 classification with a 4 month review time. A copy of the PRIA fee payment sent to the EPA lockbox is enclosed.

The following documents are included in support of this submission:

- 8570-1 Application form
- Alternate #1 CSF (2 copies)
- Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)
- Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.

Agri Star®
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS

www.albaughinc.com



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750-174	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Triclopyr BEE Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)Amendment to add alternate manufacturing facility as CSF alternate ~~2~~ #1

This amendment is being submitted under the PRIA II Fee for Service program as a EPA Class # R340 application with a 4 month review time and a fee of \$3,444.

Albaugh check # 73238 for that amount has been submitted to the EPA lockbox concurrently with this application.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registrations Manager	
4. Typed Name Morris Gaskins	5. Date September 4, 2009	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604	EPA Registration Number/File Symbol 42750-174
Active Ingredient(s) and/or representative test compound(s) triclopyr butoxyethyl ester	Date 9/4/09
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) MUP for terrestrial food use, terrestrial non-food use	Product Name Triclopyr BEE Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 9/4/09	Typed or Printed Name and Title Morris Gaskins Registrations Manager
---------------	----------------	---

21-Day Screen Completed by
Contractor

21-Day Expires on 9-30-09

Jacket # 42750-174
MRID# 478480

Content Screen: Recommended to
Pass/Fail

86-5 Review: **Passed**/Failed/NA

Transfer This Jacket to:

LINDA ARKINGTON

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 9-9-09

Experts In-Processing Signature: MF HARRINGTON Date 9-11-09

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>42750-174</u>		EPA Receipt Date: <u>9-9-09</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (link to http://www.epa.gov/oppead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)				X	

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X		
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)			X
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)			X
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

- All studies were found to be in full compliance with 86.5, MRID: 478480-01, -02 (KP)
- There are no inerts to be approved.

9-14-09

- I called Mr. Gaskins at 11:45 and received the Certification with respect to Citation of Data and 2 copies of the data matrix via e-mail at 2:09.

MRID 478480

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Script for Rejection Phone call

Contact Name: Morris Gaskins

Phone #: (515) 964-9444 ; (229) 244-3288

Email: MorrisG@albaughinc.com

First Call/Initials: [E-mail sent] Second Call/Initials:

Date: 09-14-09 [at 11:54AM] Date:

Time: 11:45

Time:

This is Katie Pittman, EPA contractor.

I'm calling regarding your submission in support of

Triclopyr Bee Technical.

We have found the following deficiencies regarding:

PR Notice 86.5: Yes or No

Volume/Study Title:

Volume/Study Title:

Volume/Study Title:

Additional volumes continued on back of page: Yes or No

Application Package: Yes or No

- need Certification with respect to citation of Data
- need both copies of Data Matrix

*Corrections rec'd 9-14-09

These deficiencies have been approved by EPA.

The corrections can be faxed to 703-305-5060/Attn: Katie Pittman.

Second Call/Email:

If we do not receive the corrections by _____, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.



Submission of Triclopyr Bee Technical
Katie Pittman to: MorrisG

09/14/2009 11:54 AM

Mr. Gaskins,

I am e-mailing you simply to follow up our phone conversation earlier regarding your submission of Triclopyr Bee Technical (EPA reg. number 42750-174). The forms necessary for your submission to be processed are as follows: 1) Certification with Respect to Citation of Data; 2) 2 Copies of Data Matrix (one internal and one external). You may e-mail or fax these forms to me at your convenience. Your cooperation is appreciated.

Thank you,

Katie Pittman
EPA Contractor
One Potomac Yard
2777 Crystal Dr. S-6954
Arlington, VA 22202
phone: (703) 305-6177
fax: (703) 305-5060



RE: Submission of Triclopyr Bee Technical 
Katie Pittman to: Morris Gaskins

09/14/2009 01:03 PM

Mr. Gaskins,

You may submit the forms with either date you prefer.

Thank you,

Katie Pittman
EPA Contractor
One Potomac Yard
2777 Crystal Dr. S-6954
Arlington, VA 22202
(703) 305-6177

"Morris Gaskins" Katie, What date do you prefer on the forms? To...

09/14/2009 12:05:29 PM

From: "Morris Gaskins" <MorrisG@albaughinc.com>
To: Katie Pittman/DC/USEPA/US@EPA
Date: 09/14/2009 12:05 PM
Subject: RE: Submission of Triclopyr Bee Technical

Katie,

What date do you prefer on the forms? Today's or 9/4/09 to match original submission?

Thanks

Morris Gaskins

-----Original Message-----

From: Pittman.Katie@epamail.epa.gov
[mailto:Pittman.Katie@epamail.epa.gov]
Sent: Monday, September 14, 2009 11:55 AM
To: Morris Gaskins
Subject: Submission of Triclopyr Bee Technical

Mr. Gaskins,

I am e-mailing you simply to follow up our phone conversation earlier regarding your submission of Triclopyr Bee Technical (EPA reg. number 42750-174). The forms necessary for your submission to be processed are as follows: 1) Certification with Respect to Citation of Data; 2) 2 Copies of Data Matrix (one internal and one external). You may e-mail or fax these forms to me at your convenience. Your cooperation is appreciated.

Thank you,

Katie Pittman
EPA Contractor
One Potomac Yard
2777 Crystal Dr. S-6954
Arlington, VA 22202

phone: (703) 305-6177
fax: (703) 305-5060



RE: Submission of Triclopyr Bee Technical 
Katie Pittman to: Morris Gaskins

09/14/2009 02:48 PM

Mr. Gaskins,

I have received the requested documents and I appreciate your timely response. Your submission may now be processed accordingly.

Thank you,

Katie Pittman
EPA Contractor
One Potomac Yard
2777 Crystal Dr. S-6954
Arlington, VA 22202
(703) 305-6177

"Morris Gaskins" Katie, Attached are the documents you requested.

09/14/2009 02:09:04 PM

From: "Morris Gaskins" <MorrisG@albaughinc.com>
To: Katie Pittman/DC/USEPA/US@EPA
Date: 09/14/2009 02:09 PM
Subject: RE: Submission of Triclopyr Bee Technical

Katie,

Attached are the documents you requested.

Please call if you need anything else.

Regards,

Morris Gaskins
Albaugh, Inc.

-----Original Message-----

From: Pittman.Katie@epamail.epa.gov
[mailto:Pittman.Katie@epamail.epa.gov]
Sent: Monday, September 14, 2009 11:55 AM
To: Morris Gaskins
Subject: Submission of Triclopyr Bee Technical

Mr. Gaskins,

I am e-mailing you simply to follow up our phone conversation earlier regarding your submission of Triclopyr Bee Technical (EPA reg. number 42750-174). The forms necessary for your submission to be processed are as follows: 1) Certification with Respect to Citation of Data; 2) 2 Copies of Data Matrix (one internal and one external). You may e-mail or fax these forms to me at your convenience. Your cooperation is appreciated.

Thank you,

Katie Pittman

EPA Contractor
One Potomac Yard
2777 Crystal Dr. S-6954
Arlington, VA 22202
phone: (703) 305-6177
fax: (703) 305-5060

[attachment "Triclopyr BEE Technical (174) - 8570-34 (090409).PDF" deleted by
Katie Pittman/DC/USEPA/US] [attachment "Triclopyr BEE Technical (174) - Data
Matrix (public copy) (090409).PDF" deleted by Katie Pittman/DC/USEPA/US]
[attachment "Triclopyr BEE Technical (174) - Data Matrix (internal copy)
(090409).PDF" deleted by Katie Pittman/DC/USEPA/US]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 10, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-419882
EPA File Symbol or Registration Number: 42750-174
Product Name: TRICLOPYR BEE TECHNICAL
EPA Receipt Date: 09-Sep-2009
EPA Company Number: 42750
Company Name: ALBAUGH INC

GREG MULHALL
ALBAUGH INC
1525 NE 36TH STREET
ANKENY, IA 50021

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman at (703) 305-6249.

Sincerely,


Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

W
{857645E~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☒ Studies? ☐ Fee Waiver?
☐ volpay % Reduction: _____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. **25**

Receipt No.

S- **857645**

EPA File Symbol/Reg. No.

4750-174

42750-174

Pin-Punch Date:

9/9/2009

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R340
~~R304~~

Granted:

R340

Amount Due: \$ 3,444

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: W. Anderson

Date: 9/10/09

Remarks:

Receipt for Section 3



S: 857645

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☒ Yes ☐ No

Company: 42750 ALBAUGH INC

V

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 25

Product #: 42750-174 Product Name: TRICLOPYR BEE TECHNICAL

Overrides#:

Me Too
Section3: 62719-87

Me Too
Product Name: TRICLOPYR BUTOXYETHYL ESTER

Application Date: 04-Sep-2009



OPP Rec'd Date: 09-Sep-2009



Front End Date: 09-Sep-2009



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Receipt Content	Des
Study	
CSF	
<div> <div></div> <div></div> </div>	

Fast Track: ☐

New Ingredient: ☐

View/Edit

Receipt Description:

To add alternate manufacturing facility as CSF alternate
1

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Albaugh Inc.
1525 N.E. 36th St.
Ankeny, Iowa 50021

US BANK
ST. LOUIS, MO 63101
MEMPHIS BANKING CENTER
80-1769(3)
0815

73238

Three thousand four hundred forty-four and xx / 100 Dollars

DATE
8/21/2009

AMOUNT
*****3,444.00

PAY TO THE
ORDER OF:

P R I A
USA

G. J. McNeill
AUTHORIZED SIGNATURE

⑈073238⑈

Albaugh Inc.

73238

VENDOR NO.: 11485

NAME: P R I A

INVOICE	REFERENCE	INV. DATE	INV. AMOUNT	DISCOUNT	ADJ. AMT.	AMT. PAID
TRICLOPYR BE		7/28/2009	3,444.00	0.00		3,444.00
<p><i>Triclopyr BEE Technical</i> <i>42750 - 174</i> <i>Alternate manf. facility #1</i></p>						
		TOTALS:	3,444.00	0.00		3,444.00

9322



U.S. Environmental Protection Agency
Office of Prevention, Pesticides and Toxic Substances

Pesticide Registration Improvement Act Fee Payment

Please fill in the form completely
Click Submit Data to make your payment

Company Name

Albaugh

Contact Name

Morris Gaskins

Telephone Number

229-244-3288

Email Address

morrisg@albaughinc.com

Decision Number

Registration Number

42750-172

Payment Amount

\$ 3,444.00

Submit Data

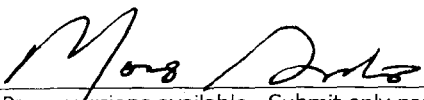
PRIA R340 submission for
an alternate manufacturing source.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.


DATA MATRIX

Date: 9/4/09		EPA Reg. No./File Symbol 42750-174		Page 1 of 5	
Applicant's/Registrant's Name & Address: Albaugh Inc. 1525 NE 36 th St. Ankeny, IA 50021		Product TRICLOPYR BEE TECHNICAL			
Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7					
Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver ²
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver ³
					Not req'd ¹
Signature 		Name and Title: Morris Gaskins Registrations Manager		Date: 9/4/09	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 9/4/09		EPA Reg. No./File Symbol 42750-174		Page 2 of 5	
Applicant's/Registrant's Name & Address: Albaugh Inc. 1525 NE 36 th St. Ankeny, IA 50021		Product: TRICLOPYR BEE TECHNICAL			
Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Waiver ⁴
					Not req'd ¹
					Waiver ⁵
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver ⁶
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd ¹
			Albaugh	OWN	
					Waiver ⁷
					Waiver ⁷
Signature 			Name and Title: Morris Gaskins Registrations Manager		Date: 9/4/09

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only paper version.

Agency Internal Use Copy


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 9/4/09	EPA Reg. No./File Symbol 42750-174	Page 3 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 1525 NE 36 th St. Ankeny, IA 50021	Product: TRICLOPYR BEE TECHNICAL	

Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Albaugh	OWN	
					Waiver ⁸
			Albaugh	OWN	
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	
Signature			Name and Title: Morris Gaskins Registrations Manager		Date: 9/4/09

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 9/4/09	EPA Reg. No./File Symbol 42750-174	Page 4 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 1525 NE 36 th St. Ankeny, IA 50021	Product: TRICLOPYR BEE TECHNICAL	

Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7

Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr generic data requirements					

Albaugh will make offers-to-pay to the following companies that appear on the current data submitters list for Triclopyr Butoxyethyl Ester.

	Nufarm Americas (228)	PAY	
	Lebanon Seaboard (961)	PAY	
	PBI/Gordon (2217)	PAY	
	BASF Sparks (51036)	PAY	
	Dow Agroscience (62719)	PAY	
	Makhteshim-Agan (66222)	PAY	
	SDTF (66607)	PAY	
	Repar Corp (69361)	PAY	
	United Phosphorous (70506)	PAY	
	ORETF (71754)	PAY	
	Ag Re-Entry Task Force (71755)	PAY	
	Nations Ag II (72167)	PAY	
	Endangered Species TF (73989)	PAY	
	Residential Exposure JV (74888)	PAY	
	AHETF (75234)	PAY	
	Generic Endangered Species TF (84653)	PAY	

Signature 	Name and Title: Morris Gaskins Registrations Manager	Date: 9/4/09
--	--	---------------------

Footnote 1

- 830.6317 Storage Stability.
- 830.6320 Corrosion characteristics
- 830.7370 Dissociation Constant

This data is not required for Technical Grade or MUP products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

- 830.1650 Formulation Process. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not deliberately formulated. See Guideline 830.1620

Footnote 3

- 830.6316 Explodability Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not composed of any explosive components.

Footnote 4

- 830.6319 Miscibility. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not intended to be diluted with oil or other non-polar solvents.

Footnote 5

- 830.6321 Dielectric breakdown voltage. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not labeled or intended for use around electrical equipment.

Footnote 6

- 830.7200 Melting Point. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not a solid product.

Footnote 7

- 830.7560 Partition Coefficient, Generator Column Method
- 830.7570 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh elected to use Guideline 830.7550 to satisfy this data requirement.

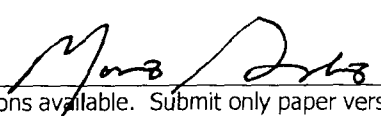
Footnote 8

- 830.7860 Water Solubility, Generator Column Method. Albaugh requests a waiver for this data requirement. Albaugh elected to use Guideline 830.7840 to satisfy this data requirement.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

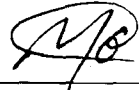
Date: 9/4/09			EPA Reg. No./File Symbol 42750-174		Page 1 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 1525 NE 36 th St. Ankeny, IA 50021			Product TRICLOPYR BEE TECHNICAL		
Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7					
Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	With application	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	With application	Albaugh	OWN	
830.1620	Description of Production Process	With application	Albaugh	OWN	
830.1650	Description of Formulation Process				Waiver ²
830.1670	Description of Formation of Impurities	With application	Albaugh	OWN	
830.1700	Preliminary Analysis	With application	Albaugh	OWN	
830.1750	Certified Limits	With application	Albaugh	OWN	
830.1800	Enforcement Analytical Method	With application	Albaugh	OWN	
830.6302	Color	473837-03	Albaugh	OWN	
830.6303	Physical State	473837-03	Albaugh	OWN	
830.6304	Odor	473837-03	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	473837-03	Albaugh	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility	475111-01	Albaugh	OWN	
830.6315	Flammability	475111-01	Albaugh	OWN	
830.6316	Explosibility				Waiver ³
830.6317	Storage Stability				Not req'd ¹
Signature 		Name and Title: Morris Gaskins Registrations Manager		Date: 9/4/09	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 9/4/09			EPA Reg. No./File Symbol 42750-174		Page 2 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 1525 NE 36 th St. Ankeny, IA 50021			Product: TRICLOPYR BEE TECHNICAL		
Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility				Waiver ⁴
830.6320	Corrosion Characteristics				Not req'd ¹
830.6321	Dielectric Breakdown Voltage				Waiver ⁵
830.7000	pH	473837-03	Albaugh	OWN	
830.7050	UV/Visible Absorption	473837-03	Albaugh	OWN	
830.7100	Viscosity	475111-01	Albaugh	OWN	
830.7200	Melting Point/Melting Range				Waiver ⁶
830.7220	Boiling Point/Boiling Range	473837-03	Albaugh	OWN	
830.7300	Density/Relative Density/Bulk Density	473837-03	Albaugh	OWN	
830.7370	Dissociation Constants in Water				Not req'd ¹
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	473837-03	Albaugh	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Waiver ⁷
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Waiver ⁷
Signature 			Name and Title: Morris Gaskins Registrations Manager		Date: 9/4/09

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only paper version.


Agency Internal Use Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 9/4/09			EPA Reg. No./File Symbol 42750-174		Page 3 of 5
Applicant's/Registrant's Name & Address: Albaugh Inc. 1525 NE 36 th St. Ankeny, IA 50021			Product: TRICLOPYR BEE TECHNICAL		
Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	473837-03	Albaugh	OWN	
830.7860	Water Solubility, Generator Column Method				Waiver ⁸
830.7950	Vapor Pressure	475111-02	Albaugh	OWN	
870.1100	Acute Oral Toxicity - Rat	CITE ALL		PAY	
870.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY	
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL		PAY	
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY	
870.2500	Primary Dermal Irritation	CITE ALL		PAY	
870.2600	Dermal Sensitization	CITE ALL		PAY	
Signature 			Name and Title: Morris Gaskins Registrations Manager		Date: 9/4/09

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only paper version.


Agency Internal Use Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date: 9/4/09		EPA Reg. No./File Symbol 42750-174		Page 4 of 5	
Applicant's/Registrant's Name & Address: Albaugh Inc. 1525 NE 36 th St. Ankeny, IA 50021		Product: TRICLOPYR BEE TECHNICAL			
Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7					
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr generic data requirements					
Albaugh will make offers-to-pay to the following companies that appear on the current data submitters list for Triclopyr Butoxyethyl Ester.					
Triclopyr BEE data	Cite-All		Nufarm Americas (228)	PAY	
Triclopyr BEE data	Cite-All		Lebanon Seaboard (961)	PAY	
Triclopyr BEE data	Cite-All		PBI/Gordon (2217)	PAY	
Triclopyr BEE data	Cite-All		BASF Sparks (51036)	PAY	
Triclopyr BEE data	Cite-All		Dow Agrosience (62719)	PAY	
Triclopyr BEE data	Cite-All		Makhteshim-Agan (66222)	PAY	
Triclopyr BEE data	Cite-All		SDTF (66607)	PAY	
Triclopyr BEE data	Cite-All		Repar Corp (69361)	PAY	
Triclopyr BEE data	Cite-All		United Phosphorous (70506)	PAY	
Triclopyr BEE data	Cite-All		ORETF (71754)	PAY	
Triclopyr BEE data	Cite-All		Ag Re-Entry Task Force (71755)	PAY	
Triclopyr BEE data	Cite-All		Nations Ag II (72167)	PAY	
Triclopyr BEE data	Cite-All		Endangered Species TF (73989)	PAY	
Triclopyr BEE data	Cite-All		Residential Exposure JV (74888)	PAY	
Triclopyr BEE data	Cite-All		AHETF (75234)	PAY	
Triclopyr BEE data	Cite-All		Generic Endangered Species TF (84653)	PAY	
Signature 			Name and Title: Morris Gaskins Registrations Manager		Date: 9/4/09

Footnote 1

- 830.6317 Storage Stability.
- 830.6320 Corrosion characteristics
- 830.7370 Dissociation Constant

This data is not required for Technical Grade or MUP products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

- 830.1650 Formulation Process. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not deliberately formulated. See Guideline 830.1620

Footnote 3

- 830.6316 Explodability Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not composed of any explosive components.

Footnote 4

- 830.6319 Miscibility. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not intended to be diluted with oil or other non-polar solvents.

Footnote 5

- 830.6321 Dielectric breakdown voltage. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not labeled or intended for use around electrical equipment.

Footnote 6

- 830.7200 Melting Point. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not a solid product.

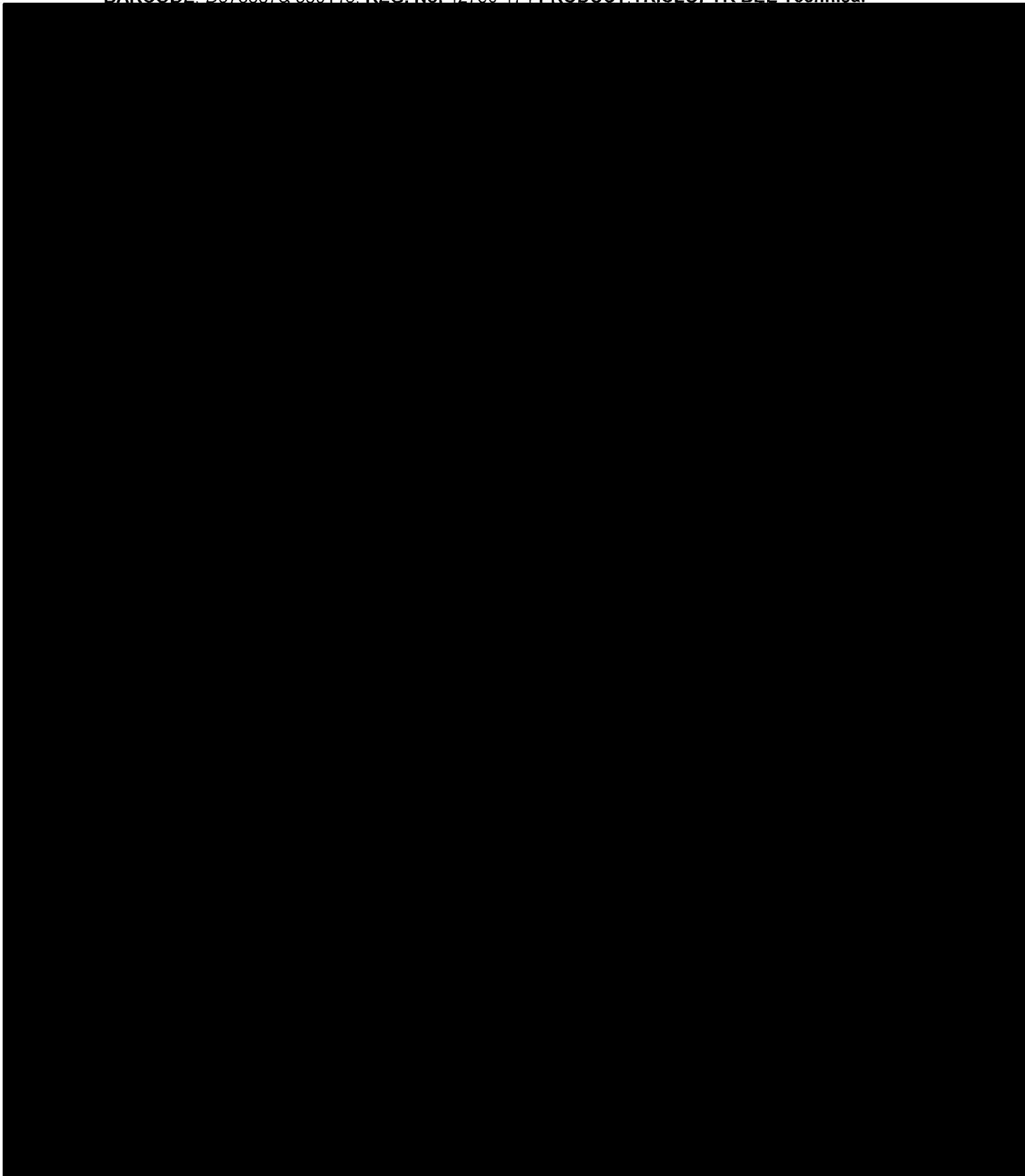
Footnote 7

- 830.7560 Partition Coefficient, Generator Column Method
- 830.7570 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh elected to use Guideline 830.7550 to satisfy this data requirement.

Footnote 8

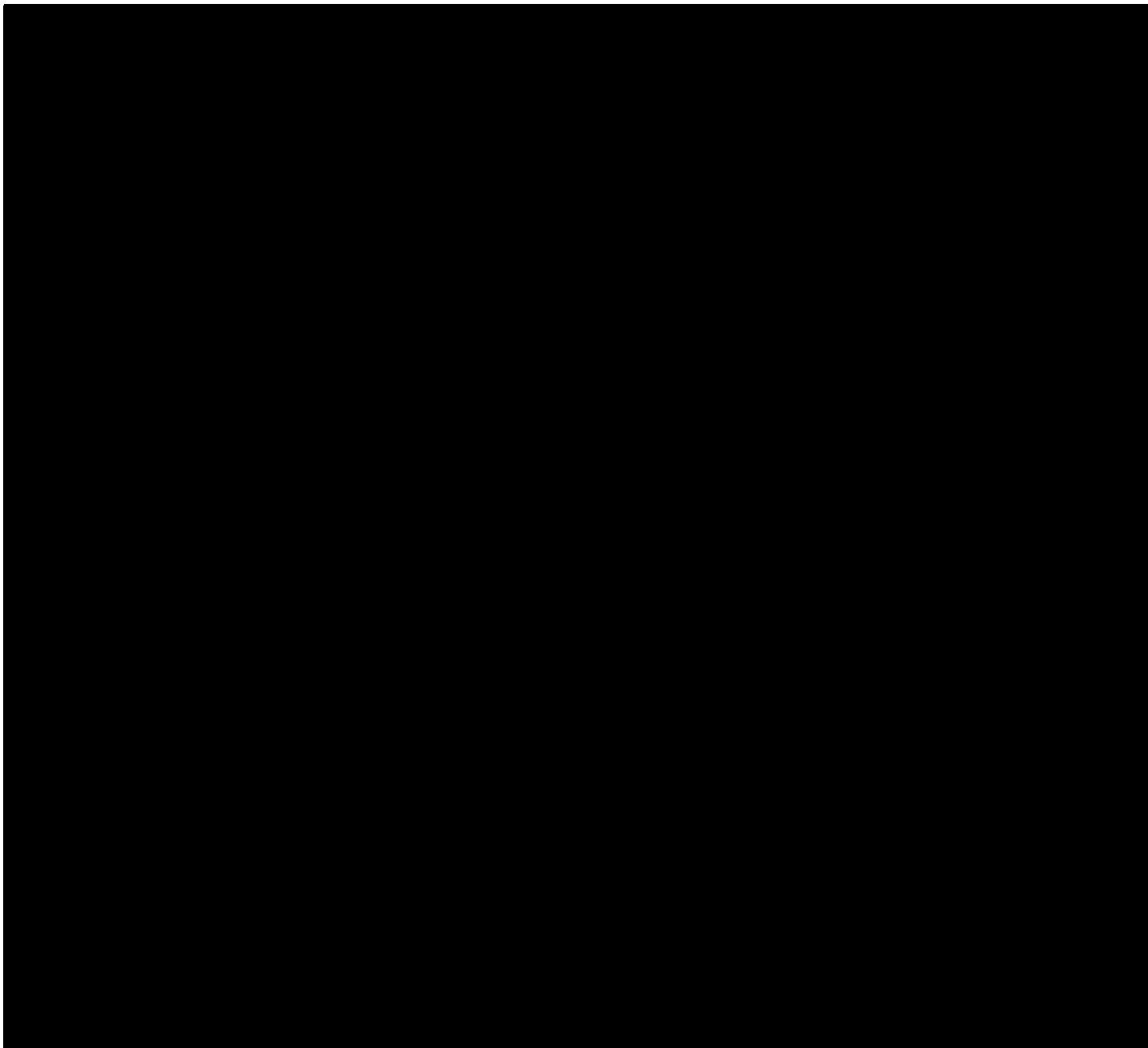
- 830.7860 Water Solubility, Generator Column Method. Albaugh requests a waiver for this data requirement. Albaugh elected to use Guideline 830.7840 to satisfy this data requirement.



Manufacturing process information may be entitled to confidential treatment

BARCODE: D373387& 380113; REG. No. 42750-174 PRODUCT: TRICLOPYR BEE Technical

830.1700.Preliminary analysis:



Manufacturing process information may be entitled to confidential treatment

TRICLOPYR BEE TECHNICAL

For Manufacturing Use Only

ACTIVE INGREDIENT:

Triclopyr BEE*: (3,5,6-trichloro-2-pyridinyl)oxy]acetic acid, butoxyethyl ester 98.0%

INERT INGREDIENTS: 2.0%

TOTAL: 100.0%

*Acid Equivalent: triclopyr – 70.4%

CAUTION

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Contract CHEMTREC at 1-800-424-9300 for transport or emergency medical treatment information.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Harmful if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

EPA Reg. No. 42750-xxx RTU

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS:

MANUFACTURED FOR:

Albaugh, Inc.
Ankeny, IA 50021

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turf; non-irrigation ditchbanks, and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such use(s). Consult Albaugh, Inc. for instructions for formulation and other information.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 32°F or agitate before use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by the state and local authorities.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

